bp

Our code

We do the right thing

Welcome to our code of conduct.

Our code is our common language, no matter where bp operates in the world or how the business challenges may change, our code anchors us to the principles and expectations that guide our daily activities, support ethical decision-making and set the standards for how we do the right thing.

Our code serves as the foundation of our company. It is how we do business - from the boardroom to the frontline. It shapes the way bp develops resources and produces energy, how we interact with the communities we live and work in, and how we behave towards our people and everyone we have contact with. It is there to guide us whenever we are unsure or feel uneasy about the choices we face.

More than that, our code is fundamental to `Who we are' both as a company and as individuals. It is how we live our purpose, how we care for others and how we play to win - the right way.

Finally, our code helps create an environment where everyone is empowered to speak up. To share ideas, ask questions, admit mistakes, give feedback and raise concerns without fear of retaliation. Our speak up channels outlined in the code are here for you. And you can choose the one you are most comfortable with, whether it is talking to a manager, to a supporting advisor or contacting OpenTalk. You have a responsibility to speak up if you see or experience something unsafe, unlawful or inconsistent with our code. bp will listen - and bp will act.

Like any policy or requirement, our code is only effective if we read it, understand it and apply it with good judgement. I, and every member of our board and leadership team, hold ourselves accountable to the standards set out in our code. We expect - and we know - that you do too.

With the code as our guide, together we are building a stronger bp.

Albert Manifold
Chair

Carol Howle
Interim CEO

Our code is at the foundation of 'Who we are' and everything we do.

We put safety first; living our safety leadership principles and following our OMS. We make ethical decisions, act responsibly and comply with applicable laws.

Our code directs and empowers us to speak up if something doesn't feel right – and to listen, and act if appropriate, when an issue is raised.

We 'Play to win' but not at all costs; we do the right thing to win the right way, by living our purpose and caring for others – together as bp.

Who we are

Live our purpose

Safety comes first

Look after each other and our company – in the real world and online

Make a positive impact

Everywhere we work – and with everyone we work with

Do the right thing

Always follow our code

Play to win

Know the competition

There is always someone better – we seek out different views and learn from them

Keep improving

Become more agile, more digital and more efficient with the money we spend

Be accountable

We follow through on our promises. When we can't – or make mistakes – we own it

Care for others

Be kind

Get to know those you work with, show real interest, be supportive

Prioritize the team

Leave your ego at the door, be inclusive, collaborative and open to honest feedback

Put yourself in other people's shoes

Especially our partners, suppliers and customers – ask how we can help them

Do the right thing – your decision tool

Feeling uncomfortable or struggling with a difficult decision? Some or all of the following questions may help:

1. **Is your decision consistent with the law, our code and 'Who we are'?**
   Read our code, our beliefs and consider relevant bp requirements.
2. **What are the potential impacts of your decision?**
   Consider who or what could benefit or be harmed, today or in the long term.
3. **What would happen if everyone made a similar decision?**
   Consider the wider implications if the decision was made across multiple teams or businesses.
4. **Have you considered if there are biases or pressures that could be influencing you?**
   Take a moment to pause and reflect.
5. **Have you considered past learnings?**
   If you can, apply them.
6. **Could you stand by your decision if it became public or headline news?**
   Put yourself in other people's shoes – think about how our stakeholders may react: employees, customers, partners and the public.

If in doubt, test it out! If you still feel uncomfortable or unsure, test your decision. It could be with your line manager or a trusted colleague, including someone with different points of view.

You are not alone – subject matter experts and our speak up channels are also always available. Remember – bp does not tolerate retaliation of any kind.

bp requirements and helpful resources

'Who we are'
Decision tool

Our responsibility and how we speak up	06 Our responsibility 06 Who must follow our code 06 How we deliver is as important as what we deliver 07 Speak up and OpenTalk 07 Our speak up channels 07 How we manage concerns and investigations 07 Zero tolerance for retaliation	
Safety and sustainability	09 Operate safely and securely 09 Delivering our sustainability frame	1
People	11 Diversity, equity and inclusion 11 Workplace free from discrimination and harassment	2
Business partners	13 Build and maintain strong relationships with suppliers and business partners 13 Stand firm against bribery and corruption 13 Appropriately exchange gifts and entertainment 14 Avoid anti-competitive conduct 14 Proactively manage conflicts of interest 14 Respect international trade laws 14 Prevent money laundering	3
Governments and communities	16 Human rights and community engagement 16 Public communications 16 The personal data in our care 17 Ethical use of digital technology 17 Our stance on political activity	4
Assets and financial integrity	19 Record and maintain accurate and complete information 19 Protect bp's assets 19 Do not engage in insider dealing 20 Glossary	5

We prioritize

the team

Our responsibility

To be a trusted company and achieve our purpose, each of us must commit to working to a consistent, high set of standards in everything we do and say, every day. Our code provides those standards for bp.

Following our code is mandatory. Each employee must read and understand our code, apply its principles and follow all of the related expectations. Our code includes links to access other relevant bp requirements (bp policies, bp procedures and bp practices), our safety leadership principles and OMS. You must be aware of these bp requirements and follow them as they apply to your role. A breach of any bp requirement is a breach of our code.

Our code is a public statement that bp is committed to doing what we believe is right. It is also a valuable resource to help you make informed, ethical decisions and do the right thing. This means thinking about how you do things – as well as what you do – and speaking up when something doesn't feel right.

Because no code of conduct can cover every situation, bp relies on you to use good judgement in line with our code and guided by 'Who we are' and our safety leadership principles. You have a responsibility to speak up when you have questions or concerns.

We operate in many countries. There may be times when local laws, regulations or customs conflict with our code. Whenever there is a conflict or a difference between an applicable law or regulation and our code, you must apply the strictest standard. Do not follow customs that violate our code. If in doubt, contact your ECL, P&C or Legal.

Who must follow our code

Our code applies to all bp employees, officers and members of the board. Our expectations apply both in person and online and your conduct does not have to occur in the workplace to violate our code, for example if it breaches a bp requirement, negatively affects the workplace or impacts bp's legitimate business interests.

Failure to follow our code may result in disciplinary action, up to and including termination of employment.

Business partners, including operated joint ventures and third parties, can have a direct impact on our reputation through their behaviour. We want to work with business partners that share our commitment to safety, ethics and compliance.

We expect and encourage all our contractors and their employees to act in a way that is consistent with our code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

How we deliver is as important as what we deliver

Responsibilities if you're an employee

- **Read, understand and act in accordance with our code**, guided by 'Who we are' and our safety leadership principles.
- **Speak up**, ask questions and raise concerns if you become aware of possible violations of applicable laws, regulations or our code. Cooperate fully when responding to a bp investigation or audit.
- **Understand and manage the risks** applicable to your role, follow all applicable bp requirements and complete all mandatory training assigned to you.
- **Complete the annual certification** to confirm whether you have acted in accordance with our code.

Additional responsibilities if you're a line manager

- **Role model 'Who we are'** with your team members and create an environment that is caring, respectful, inclusive and equitable.
- **Encourage your team to speak up** and show that they will be supported if they do by listening, responding and doing your part to make sure that no one experiences retaliation.
- **Promote compliance and risk management** by regularly discussing with your team our code's expectations, applicable risks and requirements and the importance of timely completion of mandatory training.
- **Recognize** the right behaviours, manage poor behaviours and be consistent when holding people accountable.

bp requirements and helpful resources

Our responsibility

Speak up

We care for others. Each of us has a responsibility to speak up if we become aware of something unsafe, unlawful or inconsistent with our code. In line with our safety leadership principles, we encourage and recognize speak up, and we want to learn why mistakes occur and respond supportively. If you want to raise a concern or have a question you need help with, you are not alone, our speak up channels are here for you. All concerns are taken seriously and handled confidentially under bp's management of concerns process.

We also need to listen, act and learn whenever someone else speaks up. If you're ever unsure what to do if a concern is raised to you, support is available through our speak up channels.

OpenTalk

OpenTalk, bp's global helpline, is a confidential way to raise concerns or get answers to your questions about our code. It is administered by an independent company, is available every day of the week at any time, day or night and can help you in more than 75 languages. Anyone, including contractors, partners, suppliers and customers can use OpenTalk. You can contact OpenTalk anonymously from most locations.

Anything you report will be kept confidential to the fullest extent possible consistent with law and good business practices.

bp requirements and helpful resources

Speak up and OpenTalk

Our speak up channels

Contact your line manager or another manager

Or
Contact a relevant advisor such as your ECL, P&C, Legal, E&C, S&ORA

Or
Contact OpenTalk

For more information, including local phone numbers please search "OpenTalk" from onebp

+44 (0) 800 066 8331 in the UK

+1 800 225 6141 in the US

+1 704 540 2242 the 'collect call' number which will accept your call without any charge to you

You can also submit a concern through the website at:
www.opentalkweb.com

How we manage concerns and investigations

Doing the right thing means listening to and assessing any concerns that are raised. Where appropriate, our BI team (part of E&C) will investigate any potential breaches of our code.

We assess

Generally, when a concern is raised, a triage team (incl. E&C, P&C and the ECL) will decide whether to handle the concern through management action or investigation. The process will always stay confidential, subject to need-to-know protocols.

We address

If handled as a management action, the business will provide guidance to those involved.

If we decide to investigate, BI will conduct a thorough, timely investigation by obtaining and analyzing the relevant facts to make a determination.

We act

The appointed person from the business will discuss the findings and decide what action should be taken. This may include disciplinary action consistent with bp's disciplinary policy. Feedback is provided to the individual who raised the concern, in accordance with our confidentiality principles.

Zero tolerance for retaliation

bp does not tolerate retaliation.

We consider acts of retaliation to be misconduct. Retaliation can take many forms, including threats, intimidation, exclusion, humiliation and raising issues maliciously.

If you think that you or someone you know has experienced retaliation, contact any of our speak up channels.

Safety comes first
PETZL
bp
BP Wind Energy

Our principles

Safety comes first. Nothing is more important than the safety of our people and those we work with. We work hard to protect the environment and deliver on our purpose and sustainability frame.

bp requirements and helpful resources

Operate safely and securely
Delivering our sustainability frame
– Operating Management System
– Safety Leadership Principles

Our expectations

Operate safely and securely

We must be vigilant, disciplined and always look out for one another. Each of us is responsible for working safely and living our safety leadership principles. Threats, intimidation and violence will not be tolerated.

Our Safety Leadership Principles

Together, we...

- Genuinely care about each other
- Will not compromise our focus on safety
- Encourage and recognize **speak up**
- Understand how work **actually happens**
- **Learn** why mistakes occur and **respond supportively**

Our HSSE expectations are set out as appropriate for each site or business and through systematic application of OMS for our operating entities.

- Do not undertake work that you are not qualified to perform.
- Stop work – your own or others' – if you consider it unsafe.
- Be sure that your performance is not impaired, for example by alcohol, drugs (including prescription or over-the-counter medication), or by a lack of sleep.
- Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.
- Report any accident, injury, illness or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.
- Know the emergency procedures that apply where you work.
- Expect and encourage contractors and those we work with to meet applicable HSSE requirements.

Delivering our sustainability frame

Each of us has a role supporting our sustainability frame – to get to net zero, improve people's lives and care for our planet.

- Play your part in delivering our sustainability frame.
- Understand and act consistently with bp's environmental and social policies and practices.

We put ourselves in other
people's shoes

Our principles

Our people are key to bp's success. We prioritize the team. We respect and care for each other. When we are kind and put ourselves in other people's shoes, we win individually and as a company.

Our aim is to achieve greater diversity, equity and inclusion for our workforce, customers and suppliers.

We will not tolerate any form of retaliation against colleagues who speak up.

The expectations in our code apply both in person and online. Your conduct does not have to occur in the workplace to violate our code.

bp requirements and helpful resources

Diversity, equity and inclusion

Workplace free from discrimination and harassment

– Policy: Diversity and inclusion
– Policy: Talent acquisition
– Policy: Performance development
– Policy: Disciplinary

Our expectations

Diversity, equity and inclusion

We treat everyone with fairness and respect and expect everyone we work with to do the same. We value the unique contribution each person brings to bp and take an equitable approach to caring for our people so we can achieve fair opportunities for all. We recognize that diverse and inclusive teams accomplish more and can use their differences to outperform non-diverse teams.

- Play your part to maintain a culture based on inclusion and 'Care for others', understanding the needs of your colleagues.
- Help to create diverse and inclusive environments and experiences.
- Respect the diverse beliefs and opinions of your colleagues.
- Be respectful of cultural differences.
- Encourage and listen to those who speak up.

Workplace free from discrimination and harassment

Discrimination

We do not tolerate any unfair discrimination within our workplaces or in hiring, development and career progression.

- Base your work-related decisions on merit, including those relating to reward and other benefits.
- Do not discriminate based on race, ethnicity, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, veteran status, or any other characteristic protected by applicable laws.

Harassment

We do not tolerate any physical, verbal or non-verbal forms of abuse or harassment. This includes any unwanted behaviour that could reasonably be considered offensive, intimidating or humiliating, as well as any form of sexual harassment. Exclusionary behaviour may also be considered harassment or bullying.

- Treat everyone with respect.
- Help create a work environment free from all forms of harassment.
- Do not engage in conduct that may be perceived by others as abuse or harassment.
- Do not communicate offensive messages, derogatory remarks or inappropriate jokes. This includes comments of a sexual nature or any other sexually offensive behaviour.
- Look out for each other and challenge inappropriate behaviour.

Discrimination, harassment and bullying should be reported to your line manager, P&C, Legal, E&C or OpenTalk.

We're committed
to keep improving

Our principles

We win by doing business the right way and knowing the competition. We keep improving through strong performance built on ethical and lawful business practices.

We work with our business partners in an honest, respectful and responsible way. We are a company on which others can rely.

The requirements in this section of our code are often complex and fact specific. bp has a process to assess and identify employees' exposure to some of these risk areas and provide applicable training. If you have a question or are unsure how to handle a situation, contact your ECL, Legal or E&C.

bp requirements and helpful resources

Suppliers and business partners
Anti-bribery and corruption
Gifts and entertainment
– Policy: Anti-bribery and corruption, anti-money laundering and anti-tax evasion
– Procedure: Counterparty due diligence and risk management

Our expectations

Build and maintain strong relationships with suppliers and business partners

Our suppliers and business partners are essential to our ability to do business and meet our stakeholders' expectations. That's why we choose them carefully, use an objective selection process and undertake counterparty due diligence.

We want to work with companies that share our commitment to safety, ethics and compliance.

- Engage in appropriate due diligence on our counterparties to assess legal and ethical risks. Counterparty due diligence includes assessment of bribery, corruption, trade sanctions and money laundering risk.
- Communicate our relevant expectations clearly to suppliers and business partners, agreeing contractual obligations where appropriate.
- Know and follow the bp requirements that apply in your business for your counterparties, particularly suppliers, agents, joint venture partners and governments.
- Report any indication that a supplier or business partner is not complying with applicable laws or their contractual obligations.

Stand firm against bribery and corruption

We do not tolerate bribery and corruption in any form in our business.

- Comply with anti-bribery and corruption laws, regulations and bp anti-bribery and corruption requirements and support efforts to eliminate bribery and corruption worldwide.
- Work to make sure that our business partners share and comply with our requirements.
- Do not offer or accept bribes, kickbacks or any other kind of improper payment, including facilitation payments.
- Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.

Appropriately exchange gifts and entertainment

We do not accept or provide gifts or entertainment if the intent is to bias a decision or in return for any business advantage, services or confidential information.

- Comply with our requirements on gifts, entertainment and hosting, including the E&C Register requirements for recording gifts, entertainment and hosting.
- If there is a conflict between bp's gifts, entertainment and hosting requirements and applicable external gifts and entertainment requirements, follow the strictest requirement.
- Never offer, give or receive gifts or entertainment that could be seen as a bribe or are indecent, sexually oriented or otherwise improper.
- Obtain Legal approval before paying travel expenses for government officials or agreeing to pay a per diem in connection with their travel.

Our expectations (cont.)

Avoid anti-competitive conduct

We comply with competition and antitrust laws. These are laws that protect consumers by prohibiting anti-competitive behaviour.

- Do not engage in any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.
- Understand who is an actual or potential competitor (e.g. these may include a Non-Operated Joint Venture) and the restrictions on exchanging competitively sensitive information.

bp requirements and helpful resources

Competition and antitrust
Conflicts of interest
International trade regulation
Anti-money laundering

– Policy: Competition law
– Policy: Conflicts of interest
– Policy: International trade regulations
– Procedure: Trade sanctions
– Procedure: Export controls
– Procedure: Anti-boycott

Proactively manage conflicts of interest

A conflict of interest may occur when your interests or activities affect, or appear to affect, your ability to make objective decisions for bp.

- Understand the different ways that conflicts can occur. For example:
  - Outside jobs and affiliations with competitors, customers or suppliers.
  - Working with close relatives.
  - Having an intimate relationship with someone whose pay, advancement or management you can influence.
  - Serving as a board member of another organization.
  - Investments, including those of close relatives.
- When making decisions always act objectively and in accordance with your responsibilities to bp.
- Comply with our conflicts of interest requirements, including disclosing situations that might create a conflict, or the appearance of a conflict, to your line manager and recording them in the E&C register.

Respect international trade laws

International trade laws – including economic sanctions, import and export laws and anti-boycott laws – generally prohibit or restrict dealings with certain countries, entities, individuals or items.

- Abide by the applicable trade laws of all countries in which we operate.
- Know which bp requirements apply to you and your business and follow them.
- If you are involved in lawful but high-risk transactions, you must take enhanced steps to maintain compliance with bp policy and applicable laws.
- Items intended for import or export (including tangible goods or intangibles such as software and technology) must be classified in advance, and all required labelling, documentation, licenses and approvals completed.

Prevent money laundering

Money laundering is engaging in transactions that are unlawful, involve property derived from illegal conduct or that support crime or terrorism.

- Do not become involved in money laundering and do not conduct business with persons we suspect may be linked to illegal activity.
- Report any money laundering red flags, including suspicious transactions like those involving complex or opaque structures or unclear sources of property.
- Never assist any party with unlawful evasion of taxes.

We make a positive
impact

Our principles

We want to make a positive impact by working together with governments and communities to help improve people's lives. We recognize the importance of more clean energy and a just energy transition that respects human rights and sustainable livelihoods.

We use data responsibly and protect and secure our data and systems. We are thoughtful about the impact of digital technologies on our communities.

bp requirements and helpful resources

Human rights and community engagement
Public communications
Personal data
– Policy: Human rights
– Policy: Communications & external affairs
– Policy: Data privacy

Our expectations

Human rights and community engagement

We are committed to doing the right thing when we engage with workers and communities and conduct our business. We encourage our people and businesses to care for others and participate in the local community.

We want to be a trusted neighbour, maintaining an open-minded, ethical stance and respecting diversity, local cultures and customs to make a positive impact wherever we operate. Each of us can play a role in the identification, prevention and elimination of human rights abuses, such as child labour, human trafficking and forced labour.

- Report any suspected human rights abuse in our operations or in those of our business partners to any of our speak up channels or to the labour rights and modern slavery team.
- Notify your local C&EA team in advance of speaking with representatives of community organizations or non-governmental organizations (NGOs).
- Only participate in social investment or sponsorship activity where the appropriate process has been followed and the required approvals are in place.

Public communications

It is essential that our public communications are clear, accurate, consistent and responsible.

- Only talk to the media or members of the investment community where you are authorized to do so; contact the appropriate press office or investor relations for advice.
- External presentations can be an excellent way to share our expertise with others, but make sure you have the required approvals before accepting any invitation and obtain the necessary approvals on content.
- If you are posting in any forum that can be seen by our people or those we do business with, post respectfully and remember that your social media posts and comments are not anonymous and can negatively impact the workplace or bp's legitimate business interests, including our reputation.

The personal data in our care

We respect the privacy rights of individuals and are committed to protecting the personal data of our employees, customers and others with whom bp conducts business.

When handling personal data:

- Collect and use it only for lawful and necessary purposes.
- Be transparent with individuals about how we will use their personal data.
- Store the data securely and protect it using appropriate technical and organizational measures.
- Do not share it with others without a legitimate reason. If you do need to share it, use appropriate safeguards.
- Delete the data when it is no longer required.

Our expectations (cont.)

Ethical use of digital technology

We care about any unintended consequences when developing or using digital technologies and the potential risks they may pose throughout their lifecycle.

- Take account of any relevant policies or guidance considering the ethical implications of any digital technologies you develop or use.
- If in doubt about the ethical use of digital technologies, please speak with innovation & engineering or our speak up channels.

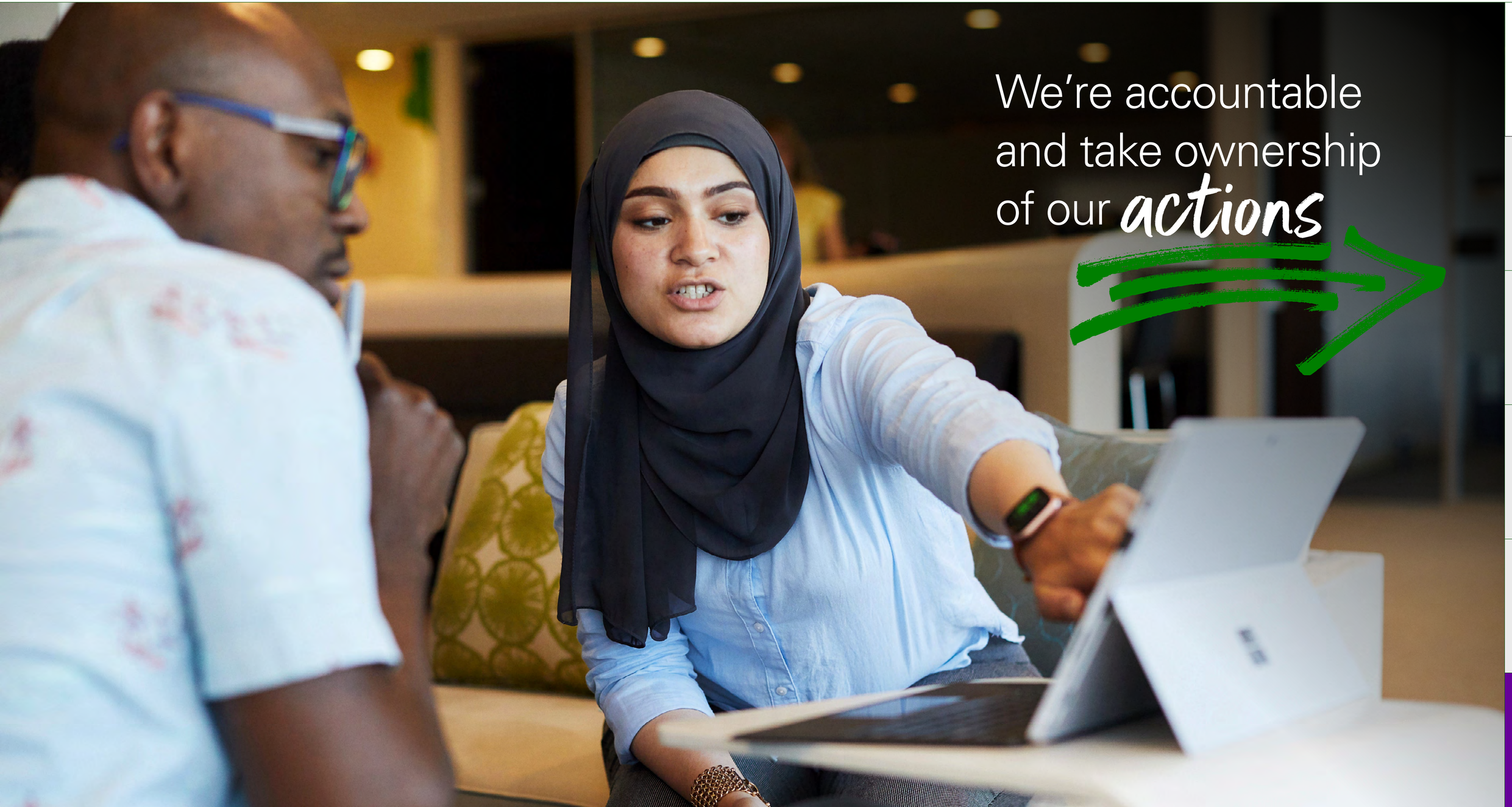
Our stance on political activity

In accordance with applicable laws, bp exercises its right to make its position known on relevant issues. As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of bp.

- Do not use company funds or resources to support any political candidate or party.
- Obtain approval before engaging in any lobbying activities.
- Personal political activities can sometimes create a conflict with bp. Talk to your line manager if you or a close relative are planning to accept or seek a public office, or if any other political activity might have an impact on bp or on your role at bp.

bp requirements and helpful resources

Digital ethics
Political activity


We're accountable
and take ownership
of our actions

Our principles

We protect shareholder value, take care of our assets and resources and are honest, accountable and transparent about our operations and performance.

We take a proactive approach to the detection and prevention of fraudulent activity against bp.

bp requirements and helpful resources

Record accurate and complete information

Protect bp's assets

Insider dealing

– Policy: Group accounting and reporting requirements
– Policy: Protecting our information
– Policy: Insider information

Our expectations

Record and maintain accurate and complete information

We all contribute to the process of recording financial and non-financial information. While protecting our interests and confidentiality, we must be open and honest about our business and performance – good and bad.

This information is essential within bp so that we can make good decisions and provide accurate and transparent disclosures to our stakeholders and the public.

- Follow applicable laws and bp requirements when creating, maintaining, retaining or destroying documents, including electronic ones.
- Ensure all transactions are properly authorized, recorded and reported, as required. Records should be fair and accurate.
- Make sure you have the necessary internal approvals when you respond to a request for information from a government or regulatory agency on bp's behalf.

Protect bp's assets

We are all responsible for protecting bp's assets from damage or fraud, including facilities, property and equipment, computers and IT systems, information, corporate opportunities and funds.

- Act appropriately to ensure company assets are not damaged, misused or lost.
- Keep your user IDs and passwords secure.
- Be vigilant against cyber-attacks and scams such as phishing and immediately report any incidents, including potential or actual losses of bp information or other assets.
- Computer equipment, phones, email and internet access are provided for business purposes and monitored regularly to help bp defend against cyber-attacks and malicious activity. Limited personal use is acceptable.
- When handling confidential information be particularly careful to encrypt it when required and share it only with authorized recipients.
- Do not share bp information externally, unless the information is classified as 'public', consistent with bp's protecting our information policy. Ensure that bp information is used only for business purposes, the removal of bp information for personal use is not permitted.
- Guard our intellectual property and respect the intellectual property rights of others.

Do not engage in insider dealing

You may become aware of information about bp that is not publicly available and that would likely be considered relevant to an investor when deciding whether or not to invest in bp securities ('inside information'). It is a criminal offence to use inside information for illegal purposes. This includes buying or selling shares or other securities, or making any trading decision based on inside information, whether you do it yourself or arrange for someone else to and whether it's for your benefit or for anyone else's.

Employees with access to potential inside information about bp may be added to an 'insider list' and will be provided with further guidance.

- Never share inside information without prior approval.
- Never buy or sell any bp securities if you have inside information.
- Never spread false information or engage in other activities intended to manipulate the price of listed securities.
- Follow the same principles in relation to inside information in respect of other listed companies.
- Remember rules on insider dealings continue to apply when you are no longer a bp employee.

If in doubt, check with Legal or the company secretary's office.

No part of our code can be waived without prior approval. Waivers will only be granted in exceptional circumstances. All requests for waivers shall be made in writing to the SVP ethics & compliance.

Our code does not alter the terms and conditions of your employment. It details what is expected of everyone at bp and supports us in being responsible and respectful. Failure to comply with our code may result in disciplinary action up to and including termination of employment.

This version of our code of conduct is effective from 1 January 2023.

Glossary

Business integrity (BI)
Communications & external affairs (C&EA)
Ethics & compliance (E&C)
Ethics & compliance liaison (ECL)
Health, safety, security and environment (HSSE)
Operating Management System (OMS)
People & culture (P&C)
Safety & operational risk assurance (S&ORA)