

Summary of Third Party Audit Reports of BPXP's Compliance with Paragraphs 5-25 of the Remedial Order Implementation Plan

The BPXP Plea Agreement Remedial Order (Exhibit B) requires BPXP to engage a Third-Party Auditor to review and report on BPXP's compliance with paragraphs 5 through 25 of the Remedial Order Implementation Plan. Each year, the Third-Party Auditor submits an Annual Audit Report to the Probation Officer, Department of Justice, and BPXP. As noted in the table below, the Third-Party Auditor did not identify any deficiencies in compliance throughout the term of the Plea Agreement.

Compliance Year	Date of Audit Report	Deficiencies
2013	August 15, 2014	0
2014	August 14, 2015	0
2015	July 19, 2016	0
2016	July 19, 2017	0
2017 (final year)	January 19, 2018	0

In the final Audit Report issued on January 19, 2018, the Third-Party Auditor noted:

"In all five reports, test procedures indicated that BPXP was in compliance with paragraphs 5 through 25 of the Plea Agreement and Implementation Plan. Repeated compliance is an indicator that Company policies and procedures in these areas are being remediated and sustained."