

Human Rights Policy

Document	Human Rights Policy
Date	07/08/2026
Revision	v.00
Approval	This Policy has been reviewed and approved by EE Group Leadership Team and is effective as of 07/08/2026

Contents

1	Introduction	2
1.1	Purpose	2
1.2	Scope	2
1.3	Internal Review and Approval	2
1.4	Acronyms	3
2	Guiding Frameworks & Standards	3
3	Human Rights Commitments	4
4	Labour & Workplace Rights	4
4.1	Forced or Compulsory Labour and Child Labour	4
4.2	Diversity, Equity and Inclusion (DEI)	4
4.3	Freedom of association	5
4.4	Dignity & Respect at Work	5
5	Community & Land Rights	5
6	Supply Chain & Business Partners	6
7	Human Rights Due Diligence	6
8	Grievance & Access to Remedy	6
8.1	Grievance Reporting Channels & Principles	6
8.2	Resolution Process	7
8.3	Mediation	8
9	Roles & Responsibilities	8
9.1	Management	8
9.2	Employees, Suppliers, and Associated Personnel	8
9.3	Human Resources Department	9
9.4	Legal and Sustainability & Regulatory Affairs Departments	9
10	Governance & Continuous Improvement	9
10.1	Oversight & Monitoring	9
10.2	Training & Awareness	10
10.3	Review & Continuous Improvement	10



1 Introduction

EuroEnergy Group is a renewable energy business that develops and operates RES assets across multiple European jurisdictions. As we expand, our responsibility to protect human rights becomes integral to how we operate, from the way we employ and manage people to how we select contractors, work with suppliers, and engage with local communities.

We are committed to ensuring that our growth does not compromise the dignity, rights, or safety of anyone connected to our activities. This Policy reflects EuroEnergy's operating model and sets out commitments and expectations regarding human rights, dignity, labour standards, and responsible practices across our operations and partnerships.

1.1 Purpose

EE Group recognises that respect for human rights is essential to responsible business conduct, sustainable growth, and the integrity of our relationships with employees, partners, and communities. As a lean organisation operating across five countries, we focus on human rights as most relevant to our workforce and our contractor-dependent business model.

This Policy sets out our commitments and expectations regarding human rights, dignity, labour standards, and responsible practices across all EuroEnergy operations and partnerships.

1.2 Scope

This Policy applies to:

- All EuroEnergy Group companies and all operations and activities carried out by the Group.
- All Group employees, regardless of location or employment type.
- Contractors, suppliers, service providers, and any third parties performing work on behalf of EuroEnergy.
- Third-party personnel working at our premises (offices, construction sites, or operating assets).
- Any individual representing, acting on behalf of, or contracted by EuroEnergy.

Considering EuroEnergy operates across multiple jurisdictions, local legislation always prevails where it imposes stricter requirements than those outlined in this Policy. All EuroEnergy companies are required to adhere to, and comply with, the standards set out in this Policy in addition to applicable local laws.

1.3 Internal Review and Approval

This policy is reviewed by the Human Resources, Sustainability & Regulatory Affairs and Legal Departments on a periodic, as-needed basis to ensure it remains accurate, compliant, and aligned with the Group's operational and regulatory requirements.



Following each review, proposed updates are submitted to the EuroEnergy Group Leadership Team for final approval. Once approved, revisions are communicated to all employees across all EuroEnergy entities.

1.4 Acronyms

Acronym	Description
DEI	Diversity, Equity and Inclusion
EE or Group	EuroEnergy Group
EPC	Engineering, Procurement, Construction
HR	Human Resources
ILO	International Labour Organization
OECD	Organisation for Economic Co-operation and Development
O&M	Operation and Maintenance
RES	Renewable Energy Sources
UN	United Nations

2 Guiding Frameworks & Standards

EuroEnergy's approach to human rights is guided by internationally recognized frameworks, adapted to the scale of the Group's business and operational jurisdictions. Specifically, we align with:

International Standards

- UN Guiding Principles on Business and Human Rights, our core framework for due diligence, responsibility, and remedy.
- ILO Core Conventions, including freedom of association, elimination of forced and child labour, non-discrimination, and safe working conditions.
- OECD Guidelines for Multinational Enterprises, particularly regarding labour practices, responsible business conduct, and supply-chain oversight.
- UN Global Compact Principles, covering human rights, labour, environment, and anti-corruption.

Applicable Local Legislation

EuroEnergy complies with relevant national laws in each country where we operate, including, among others:

- Non-discrimination laws such as Greek Law 4443/2016;
- Anti-slavery and anti-trafficking legislation, including the UK Modern Slavery Act (2015), where relevant to our operations and supply chain.



These frameworks shape how we manage people, select contractors, build assets, and interact with local communities across our regions of operation.

3 Human Rights Commitments

EuroEnergy upholds the protection of internationally recognised human rights across all operations and partnerships. Our approach is grounded in fairness, respect, and ethical conduct, ensuring that our growth does not compromise the dignity or rights of anyone connected to our activities.

We are committed to:

- Prohibiting forced, compulsory, and child labour in all circumstances,
- Ensuring equal opportunities, diversity, equity, and inclusion in the workplace;
- Respecting employees' freedom of association and their right to collective bargaining;
- Promoting a work environment that is safe, respectful, and free from harassment, discrimination, or abuse;
- Expecting suppliers, contractors, and partners to uphold the same standards and excluding any party that fails to comply with international human rights and labour requirements.

4 Labour & Workplace Rights

4.1 Forced or Compulsory Labour and Child Labour

Forced or compulsory labour is defined as any work or service carried out by an individual against their will and under the threat of punishment. Such practices violate fundamental human rights and undermine the principles of dignity, choice, and fair treatment. Child labour refers to work that deprives children of their childhood, education, safety, or development, and may be physically, socially, or morally harmful.

EuroEnergy strictly prohibits all forms of forced or child labour. While the Group's internal workforce operates in regulated jurisdictions with low exposure to such risks, we expect all suppliers, contractors, and partners to comply with international labour standards.

Any partner failing to meet these requirements will be excluded from cooperation.

4.2 Diversity, Equity and Inclusion (DEI)

EuroEnergy recognises that discrimination of any kind in the workplace is unacceptable and, in many cases, unlawful. We ensure equal opportunity throughout all stages of employment, including recruitment, onboarding, training, development, performance evaluation, and promotion.



Employment decisions are based solely on merit, capability, and business needs. No applicant or employee shall receive less favourable treatment on the basis of race, colour, nationality, ethnic origin, gender, sexual orientation, gender identity, marital status, pregnancy or maternity, disability, age, religion or belief, political views, or any other protected characteristic.

All employees are expected to contribute to an environment of fairness, dignity, and inclusion. Individuals who believe they have experienced discrimination may raise concerns confidentially and without fear of retaliation through the Group's Whistleblowing & Grievance online platform.

Any breach of the above standards may result in disciplinary action, up to and including summary dismissal.

4.3 Freedom of association

We are committed to upholding freedom of association and the effective recognition of the right to collective bargaining. All employees are free, without fear of discrimination, intimidation, or retaliation, to form, join, or choose not to join worker organisations. The role and rights of lawful employee representatives are fully respected.

Where collective bargaining takes place, it is conducted through open dialogue, transparency, and in compliance with applicable laws and international labour standards. Any action that restricts, undermines, or interferes with these rights is strictly prohibited.

4.4 Dignity & Respect at Work

EuroEnergy maintains zero tolerance for bullying, harassment, sexual harassment, intimidation, violence, or any behaviour that undermines personal dignity.

These expectations apply to all employees, contractors, suppliers, and any individuals connected to our operations.

5 Community & Land Rights

EuroEnergy respects the rights of local communities in areas where we develop and operate renewable-energy assets. We are committed to:

- Complying with applicable land, permitting, and environmental laws;
- Engaging local stakeholders transparently;
- Avoiding adverse impacts on local livelihoods;
- Ensuring fair, responsible, and lawful land access processes;
- Preventing conflicts through early communication and responsible project siting.



We maintain high standards of conduct when interacting with landowners and local communities.

6 Supply Chain & Business Partners

We expect our suppliers, EPC contractors, O&M providers, and partners to uphold international human rights and labour standards throughout our value chain. Under this principle, we require suppliers to comply with this Policy and specifically:

- Prohibit forced and child labour;
- Provide safe working conditions;
- Prevent harassment, discrimination, or abuse;
- Respect freedom of association;
- Comply with all applicable laws and contractual requirements.

7 Human Rights Due Diligence

EuroEnergy conducts proportionate due diligence to identify and manage human rights impacts in our operations and supply chain. This includes:

- Screening contractors and suppliers;
- Assessing human rights risks related to project activities;
- Escalating and addressing identified concerns;
- Implementing corrective actions where needed.

The Group is developing an inventory of key suppliers and contractors, which will be evaluated and prioritised on ESG criteria, including human rights practices, labour standards, and health & safety. Non-compliant partners may be excluded or subject to corrective action.

8 Grievance & Access to Remedy

The Group provides safe, accessible, and confidential channels for raising concerns related to human rights, dignity at work, labour standards, or any behaviour inconsistent with this Policy.

Grievances may be raised by employees, former employees, contractors, trainees, job applicants, suppliers, community representatives, witnesses, or any individual affected by EuroEnergy's activities.

8.1 Grievance Reporting Channels & Principles

Individuals connected to our operations may report human rights concerns through:

- Their Department Head or Country Manager;
- The HR Department;



- The Group's Whistleblowing & Grievance online platform (anonymous option available).

EuroEnergy ensures that:

- All concerns are handled seriously, fairly, objectively, and in confidence;
- Retaliation against any person raising a concern in good faith is strictly prohibited;
- Investigations are carried out promptly and impartially;
- Appropriate remedial action is taken where violations are identified.

Because dignity-related misconduct represents the Group's only material internal human rights risk, concerns related to bullying, harassment, discrimination, intimidation, or other breaches of respectful workplace conduct will be examined under enhanced dignity-at-work procedures.

EuroEnergy may initiate an investigation even without a formal complaint where there are reasonable grounds to believe that inappropriate or harmful behaviour has occurred. Behaviours of concern may include, but are not limited to:

- Bullying, harassment, or sexual harassment;
- Discrimination or abusive conduct;
- Threats, intimidation, or coercion;
- Misconduct relating to health & safety, environmental protection, or data privacy;
- Conflicts of interest or ethical violations;
- Financial misconduct or fraud;
- Abuse of authority or other serious misconduct.

Third-party harassment of EuroEnergy personnel is also prohibited. Corrective action may be taken against external parties whose behaviour breaches this Policy.

Where necessary to protect the wellbeing of individuals or the integrity of an investigation, EuroEnergy may temporarily reassign or suspend, with full pay, either the person alleged to have breached this Policy or, where appropriate, the complainant. Such measures do not constitute disciplinary action and imply no presumption of wrongdoing.

8.2 Resolution Process

8.2.1 Informal Resolution (Optional)

An employee may raise the issue directly with the person concerned or contact HR to seek guidance or support.

8.2.2 Formal Resolution

Where informal resolution is inappropriate, unsuccessful, or where the alleged behavior is serious, a formal written complaint may be submitted to the HR Department or to the



employee's Department Head. HR will guide the complainant on the process for preparing and submitting a formal complaint.

Individuals also have the option to raise a formal complaint through the Group's Whistleblowing & Grievance online platform (even anonymously, if so selected).

Department Heads are responsible for addressing concerns promptly. This includes:

- Meeting confidentially with the complainant to understand the concern;
- Documenting key facts (what happened, when, who was present);
- Initiating an investigative meeting with the individual alleged to have breached the Policy;
- Objectively assessing the information received;
- Determining appropriate next steps in consultation with HR and, where relevant, Legal;
- Communicating outcomes to the relevant individuals.

All investigation records are kept securely in accordance with data-protection requirements.

8.3 Mediation

Independent and impartial mediation, conducted by a qualified mediator, will be made available to assist in resolving interpersonal disputes related to dignity-at-work concerns. Mediation may be requested by either party by contacting the HR Department. Mediation will only proceed where both parties voluntarily agree to participate. It is intended as a constructive, confidential, and non-adversarial process to support resolution and restore a respectful working environment.

9 Roles & Responsibilities

Effective implementation of this Policy requires clear responsibilities across all levels of the organisation and within our broader value chain.

9.1 Management

Management is responsible for ensuring the effective implementation of this Policy, including:

- Embedding human rights commitments into day-to-day operations;
- Conducting regular risk assessments, with emphasis on dignity-at-work risks;
- Ensuring appropriate preventive and corrective measures are in place;
- Supporting staff who raise concerns in good faith;
- Promoting a culture of respect, dignity, and fairness.

9.2 Employees, Suppliers, and Associated Personnel

All employees, suppliers, contractors, and any individuals covered by this Policy must:

- Treat others with dignity and respect at all times;



- Refrain from engaging in violence, harassment, discrimination, or any form of abusive behaviour;
- Report misconduct or concerns in good faith through available reporting channels;
- Cooperate with investigations when required.

9.3 Human Resources Department

The HR Department, supported by the Legal and Sustainability & Regulatory Affairs Departments, where necessary, is responsible for:

- Maintaining confidential reporting channels, including supporting use of the Whistleblowing & Grievance Platform;
- Ensuring appropriate documentation, investigation, and follow-up of all complaints;
- Securing all investigation records in line with data-protection requirements;
- Providing support and guidance to affected individuals;
- Delivering training to ensure employees and contractors understand their responsibilities under this Policy;
- Advising Department Heads on appropriate corrective actions and policy compliance.

9.4 Legal and Sustainability & Regulatory Affairs Departments

- Ensuring compliance with national laws, international frameworks, and contractual requirements.
- Advising HR and Management on complex or serious cases involving legal or regulatory considerations.

10 Governance & Continuous Improvement

EuroEnergy is committed to maintaining strong governance over its human rights commitments and ensuring continuous improvement as the Group grows and its operations evolve.

10.1 Oversight & Monitoring

Responsibility for the effective implementation of this Policy is shared across several Group functions:

- Senior Management provides strategic oversight and ensures adequate resources for human rights management;
- Human Resources oversees workplace-related human rights matters, including dignity-at-work risks, reporting mechanisms, and internal awareness;
- Sustainability & Regulatory Affairs in liaison with Operations integrates human rights considerations into supply-chain management, contractor oversight and project development'



- Legal ensures compliance with applicable legislation, international standards, and contractual human rights requirements.

10.2 Training & Awareness

The Group communicates this policy and other human rights-related policies (Code of Conduct & Business Ethics, Health & Safety, Human Resources, Sustainability and Procurement) to employees, partners and suppliers/contractors with particular emphasis on dignity-at-work expectations, ethical behavior, reporting channels and supply chain-related human rights considerations.

10.3 Review & Continuous Improvement

This Policy is periodically revised as needed, where operational changes or new legal or regulatory requirements warrant an update. Lessons learned from grievances, supplier evaluation, audits, or stakeholder feedback are used to strengthen EE's human rights approach over time.

We are committed to maintaining strong governance over our human rights commitments and ensuring continuous improvement as the Group grows and its operations evolve.

