

Subject: Human Rights Policy

Application Areas
Perimeter: Greece

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CHIEF OF PEOPLE, CULTURE AND SUSTAINABILITY OFFICER
Eugenia MELEA



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1. DOCUMENT AIMS AND APPLICATION

This policy sets out Principia Energy Group of Companies commitment and responsibilities in relation to all the Human Rights and especially those applicable to the business activities and corporate operations carried out by the workers of Principia Energy Group of Companies, whether they be executives or employees of these enterprises.

Principia Energy promotes respecting of all Human Rights within its business relationships and adherence to the same Human Rights standards by its contractors, suppliers, and business partners, paying particular attention to conflict-affected and high-risk contexts.

This procedure shall be implemented and applied to the extent possible within Principia Energy Group of Companies in compliance with any applicable laws, regulations, and governance rules, including any stock exchange and unbundling-relevant provisions, which in any case prevail over the provisions contained in this document.

This document shall require a formal review every 3 years, or earlier if determined by the business to achieve continuous improvement.

2. DOCUMENT VERSION MANAGEMENT

Version	Data	Main changes description
1	23/01/2024	First issuing of New Local Policy
2	22/04/2024	Change of Company name

3. UNITS IN CHARGE OF THE DOCUMENT

Process Owner responsible for drawing up the document: Human Resources

Responsible for collaborating on the document (1): HS&Q

Responsible for collaborating up the document (2): Legal & Corporate Affairs

Responsible for authorizing the document: Chief of People Culture and Sustainability Officer, Chief Executive Officer

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4. COMPANY'S COMMITMENT TO RESPECTING HUMAN RIGHTS

The Company is focused on creating sustainable value shared with its internal and external stakeholders and leveraging the respect of diversity throughout the entire value chain of the businesses in which it operates.

Innovation and sustainability are inseparable parts of our strategy, together with the spirit of service and care for the well-being of people and the society in which we operate. We belong to the territory, and we are an essential element in the lives of people, businesses, and society at large.

Our journey started by fostering access to electricity to an increasing number of people: we have then opened to new technologies, new services, new ways of using energy, new partnership models, engaging all our stakeholders as much as possible to create a more sustainable future together.

A sustainable strategy and an integrated business model enable contribution to the United Nations Sustainable Development Goals while balancing risks.

We have placed SDG 13 "Action to combat climate change" at the centre. As a party in the energy transition, which is a true transformation process, we would like to: decarbonize the energy mix and drive the growth of renewable capacity (SDG 7 "Clean and affordable energy"); electrify consumption, empower resilient and efficient infrastructure (SDG 9 "Industry, innovation and infrastructure") and digital platforms and services (SDG 11 "Sustainable cities and communities").

A fair and inclusive transition does not leave anyone behind and takes into account the needs of all the stakeholders, and, specifically, the most vulnerable ones. To this end we:

- proactively consider the needs and priorities of people and wider society because this leads to process and product innovation which is key for a competitive, inclusive and sustainable business model, including the adoption of circularity principles, protection of natural capital and of biodiversity;
- promote the involvement of the main external and internal stakeholders to enhance awareness and develop a constructive dialogue that can provide a valuable contribution to the creation of solutions that mitigate climate change.

We believe that the business has the capability to contribute to positive impacts in society: the respect of Human Rights is a fundamental element to empower sustainable progress beyond pure compliance to existing regulations.

Through the Policy, we commit to respect all Human Rights, and specifically the ones more strictly connected to our value chain.

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We commit to monitor the implementation of the policy hereof i) through a specific due diligence process, ii) the promotion of practices in line with a just and inclusive transition, and iii) by reporting evidence of action plans developed to prevent and remedy should critical issues occur.

The policy sets out the commitment and responsibilities that all the people working in our corporation undertake in relation to Human Rights, and especially those applicable to our business activities and corporate operations, as well as the standards that our stakeholders should abide by.

5. PRINCIPLES

We have selected the principles based on their relevance to our business activities and relationships, and on the outcome of the stakeholders' consultation process mentioned before.

We commit to respect such principles in any country or region where we operate, with regard for the cultural, social, and economic diversities from one country to another and require that each stakeholder deals with us in accordance with them.

By stakeholders, we refer to any party with a direct or indirect interest in our business, such as customers, people working in the corporation, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them.

Specifically, in addition to guaranteeing the necessary quality standards, suppliers are requested to adopt best practices in terms of human rights and working conditions (including adequate hours worked, forced or child labor, respect for personal dignity, non-discrimination and inclusion of diversity, freedom of association and collective bargaining), occupational health and safety, environmental responsibility, and respect for data protection by design and by default.

With our commitment we are striving for sustainable progress, to make our company and the communities in which we operate more prosperous, more inclusive and more resilient.

5.1. Employment practices

Rejection of forced or compulsory labor and child labor

We reject the use of any form of forced or compulsory labor and any form of slavery and human trafficking as define by ILO Convention n.29 and we do not confiscate either money or identity papers to retain workers against their will.

We consider children and young workers as groups mostly likely affected, that is why we take the utmost care in respecting their rights across all the activities connected to the value chain.

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We reject the use of child labor. Workers' minimum age is defined by the existing legislation in the country where the activities are conducted, and in any case should not be lower than the minimum age, established by ILO Convention n.138

Respect for diversity and non-discrimination

We promote principles of diversity, inclusion, and equal treatment and opportunity, and we are committed to guaranteeing the right to working conditions, as well as creating a working environment where people are treated fairly and valued for their uniqueness.

We are committed to protecting the physical and psychological integrity and individuality of each person. We oppose all forms of behavior that result in discrimination in relation to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and all other forms of individual diversity, or that is detrimental to the person and their convictions or preferences. Accordingly, we promote people's freedom of expression.

We do not tolerate physical, verbal, visual, sexual, or psychological harassment such that results in a working environment that is denigrating, hostile, humiliating, intimidating, offensive, or unsafe.

We undertake to always respond to suggestions and complaints made by customers and consumer associations, making use of appropriate and timely communication systems, and to consider the needs of all our customers, paying particular attention to people with disabilities.

Freedom of association and collective bargaining

We protect the right of the people working with us to form or take part in organizations aimed at defending and promoting their interests. Likewise, we respect their right to be represented, within the various working units, by unions or other forms of representation elected in accordance with the legislations and practices in force in the varying countries where they work. Collective bargaining is for us the favored instrument for setting contractual conditions of the people working with us as well as regulating relations between management and unions.

Health and safety

We consider the health, safety, and psychological, relational, and physical well-being of individuals the most precious asset to be protected, at work and personal time.

We are committed to developing health, safety, and well-being culture throughout our Group to ensure that workplaces are free from health and safety hazards and to promoting behaviors oriented towards work-life integration.

We are actively involved in promoting personal and organizational well-being as an enabler of the engagement and innovative potential of people.

By doing so, we aim at increasing awareness of risks and promoting responsible behaviors and preventive measures in order to eliminate risks.

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Our suppliers and contractors are an integral part in our development and awareness programs: each person must feel that they are responsible for their own health and safety as well as for the others.

Our commitment also unfolds in integrating health and safety in processes and in training activities, in rigorous selection and management of suppliers/contractors in sharing knowledge and in constant review to benchmark our practices.

Our commitment also unfolds in integrating health and safety in processes and in training activities, in a rigorous selection and management of suppliers/contractors, in sharing knowledge and in constantly benchmarking our practices.

Just and favorable working conditions

Every person working with us, along the entire value chain, has the right to conditions that respect their health, safety, well-being and dignity, maximum working hours, daily and weekly rest periods and an annual period of paid leave.

Remuneration of the people we employ is based on fair reward principles as well as respecting pay equality for men and women carrying out the same job. Minimum compensation cannot be lower than the minimum living wage, set in law regulations in force in each country in accordance with the provisions of the ILO Conventions. We also believe in the importance of professional orientation and training for the development of our people and their skills, even more so in situations impacted by the energy transition and that prompt us to adopt a circularity-based approach which translates into requalifying and enhancing existing potential by way of reskilling and upskilling programs to foster a just transition.

5.2. Communities and Society

Environment

Protection of the environment and natural resources, climate action, and contribution to a sustainable economic development are strategic factors in the planning, performance, and development of our operations, alongside our broader commitment to accelerate the decarbonization and electrification processes to allow the global warming containment objectives in accordance with the Paris Agreement while at the same time driving achievement of the United Nations Sustainable Development Goals.

Our commitment is testified by the four key principles of our environmental policy:

- Protecting the environment by preventing impacts to it;
- Improving and promoting the environmental sustainability of products and services;
- Creating shared value for the Company and stakeholders;
- Complying with legal obligations and voluntary commitments and promoting ambitious environmental management practices.

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Respecting the rights of communities

We are aware that our activities can have a direct or indirect influence on the communities where we operate: that is why responsible community relations constitute a pillar of our strategy.

Individual conditions, economic and social development, and general well-being of collectivity are strictly connected: we therefore commit to conducting our capital expenditure in a sustainable manner and to promoting cultural, social and economic initiatives for the local and national communities involved to advance social inclusion through education, training and access to energy.

We commit to conducting our operations in a sustainable manner and to promoting cultural, social and economic initiatives for the local and national communities involved to advance social inclusion through education, training and access to energy.

We also commit to ensuring that our products and services are designed to be accessible for all and do not compromise the safety and physical integrity of our customers, as far as reasonably foreseeable.

Respecting the rights of local communities

We are committed to respecting the rights of local communities and to contribute to their economic and social growth.

Likewise, we collaborate with suppliers, contractors and partners that respect Human Rights and contribute to the social-economic development of the communities where we operate.

This goes through and is not limited to promoting free, prior, and informed consultation activities and implementing social inclusion actions (local resources, health and safety training, development of local projects - also in partnership with local organizations). In addition, knowledge of the specific local requirements and continuous listening to the communities needs allow us to develop actions in unexpected and unprecedented emergency conditions.

More specifically, in the designing and construction of infrastructure projects, we commit to taking due account, within proper environmental and social impact assessments, of their environmental footprint and of the respect of Human Rights in the areas where the projects will be developed.

Taking as a reference, the Voluntary Principles on Security and Human Rights, we require that private security forces protecting Group's personnel and assets in operating areas act in the same manner and in a way consistent with the applicable national law and regulation and international standards.

Respecting the rights of indigenous and indigenous peoples

We pay particular attention to the most vulnerable communities, such as Indigenous Peoples, and commit to respect the United Nations Declaration of the rights of Indigenous Peoples.

In developing our projects, we commit to engage all the relevant stakeholders, including Indigenous Peoples we believe active community engagement throughout the process is essential.

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Integrity: zero tolerance of corruption

We reject corruption in all its forms, both direct and indirect. We believe it is one of the factors undermining institutions and democracy, ethical values and justice, and the well-being and development of society.

To this end, we reiterate our commitment to fight corruption through a plan called “Zero Tolerance of Corruption” which is one of the pillars on which our anti-bribery management system is grounded.

Privacy

We respect the confidentiality and right to privacy of our stakeholders. We are committed to the correct use of the information and data relating to the people working in our organization, to our customers and to any other stakeholder.

Data protection and processing are an important challenge for us in the era of digitalization and market globalization.

We process personal data in compliance with the fundamental rights of data subjects and we abide by the rights and principles recognized in law, notably respect for private and family life, home location details and communications, personal data protection, freedom of thought, conscience and religion, freedom of expression and information.

Data protection by design and by default are an integral part of our digitalization processes, as are risk analysis and the protection of sensitive data.

Privacy is assured by adopting international standards and the way data is processed and stored is defined with the support of the Data Protection Officer (DPO) in compliance with our policies and any European and national regulations.

We also strive to monitor all third-party companies that may be able to use the personal data of customers. To this end, dedicated clauses are included in contracts with partners who use personal data to carry out specific activities, such as sales services or customer satisfaction surveys.

Communication

We commit to ensuring that institutional and commercial communications are non-discriminatory and respectful of different cultures, while also not adversely affecting the most vulnerable audiences, such as children and the elderly.

In addition, we require that contracts and communications addressed to our customers should:

- be clear and simple, drawn up using a language as close as possible to the one normally used by the people for which the message is intended to;
- abide by statutory legislation, without resorting to evasive or improper practices;
- be exhaustive and not omit any relevant item that might affect the customer’s decision;

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- be available on our websites;
- be accessible, in order to accommodate the needs of people with disabilities.

6. IMPLEMENTATION AND MONITORING

Implementation and monitoring of our commitment to the principles illustrated relies on an appropriate due diligence process.

The perceived risk assessment, together with the gap analysis, makes it possible to assess the residual risk and define any improvement actions required. Specific action plans are therefore developed for each country of presence, as well as a centrally managed improvement plan that has the objective of harmonizing and integrating, at global level, processes, and policies to be applied at local level.

Suppliers are constantly monitored in so far as Human Rights are concerned thanks to artificial intelligence tools that enable early identification of elements that might become critical and that prompt the development of the necessary ensuing actions.

Management of the positioning on human rights is entrusted to Human Resources unit. The unit is also responsible for integrating the Policy on Human Rights in corporate processes and monitoring that due diligence activities are carried out properly.

6.1. Stakeholders grievance

Stakeholders, whether internal or external, believing a violation might have occurred, may either resort to specific violation reporting channels or to the Antibribery Compliance Committee.

The Antibribery Compliance Committee analyzes the grievance, contacting the author, if necessary, and the person responsible of the alleged violation, ensuring uniform treatment at Group level, in compliance with company policies and local regulations.

Whenever, following a grievance, a violation of the principles contained in the Policy hereof is ascertained, the relevant procedure provided for in the Code of Ethics shall be implemented.

We ensure that whistleblowers are not subject to any acts of retaliation and that their identity remains confidential, unless otherwise required by the law.

Whistleblowers may resort to the following contact channels:

- in written form, via the web, through the online anonymous reporting system available at the following link: <https://forms.office.com/e/gHuNUhY5LG>, which is also accessible to persons with

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disabilities, or, by post by sending it to the postal address of Principia Energy, Sorou 18, Marousi, Greece, 15125.

- orally by telephone or other voice messaging systems by contacting the numbers +30 2111808573 & +30 2111808550.
- via Email: compliance@principia-energy.com or, at the request of the whistleblower, through a direct meeting set within a reasonable time through the aforementioned channels.

Tasks of Human Recourses

HR has the following duties:

- planning and coordinating the implementation of the due diligence process, in conjunction with the other relevant functions involved, to the extent of the areas of their responsibility;
- reporting to the CEO on the implementation of the due diligence process

7. COMMUNICATION AND TRAINING

The Human Rights Policy shall be circulated to internal and external stakeholders through specific communication initiatives. Training initiatives will be carried out to ensure that the Policy is properly understood by all the Principia Energy Group of Companies' employees.

8. REFERENCES

This Policy supports the following treaties of International and European law and applies their founding principles:

1. The International Bill of Human Rights of the United Nations (UN)
 - a) Universal Declaration of Human Rights;
 - b) International Covenant on Civil and Political Rights;
 - c) International Covenant on Economic, Social and Cultural Rights;
2. The core conventions of the International labour Organization (ILO) - no. 29, 87, 98, 100, 105, 111, 138, 182 - and the Declaration on fundamental Principles and Rights at Work;
3. The United Nations Convention on the Rights of the Child;
4. ILO Conventions no. 107 and no. 169 on the Rights of Indigenous and Tribal Peoples;
5. The European Convention on Human Rights.

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The latest versions of the following business standards and voluntary initiatives have also been taken into consideration:

1. The UN Global Compact principles;
 2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises;
 3. The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy;
 4. The “UN Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ framework”
 5. UN Declaration on Indigenous People
 6. The UK Modern Slavery Act 2015
 7. International Finance Corporation Stan
- Code of Ethics
 - Whistleblowing Policy
 - Zero Tolerance of Corruption Plan
 - Compliance Program

List of documents issued by external organizations (laws, guidelines, regulations):

- * ISO 9001:2015 Quality Management System – Requirements;
- * ISO 14001:2015 Environmental management systems – Requirements with guidance for use;
- * ISO 45001:2018 Occupational health and safety management systems – Requirements;
- * ISO 37001:2016 Anti-bribery management systems – Requirements with guidance for use.]

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9. DEFINITION AND ACRONYMS

Acronym and Key words	Description
Forced and Compulsory labour	All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.
Business relationships	Relationships with business partners and enterprises in the value chain, as well as any other government or non-government entity, directly linked to the operations, products, or services of the enterprise.
Discrimination	- The term discrimination includes both direct and indirect discrimination, respectively: any distinction, exclusion or preference based on race, colour, sex, age, sex orientation, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; - any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.
Due Diligence	The term due diligence on human rights refers to a continuous management system that an enterprise implements according to the industry it operates in, its operating environments, the size of the enterprise and other factors, to ensure that it respects human rights and that it is not a party to the abuse of those rights. This involves 'identifying, preventing, mitigating and accounting' the potential negative impacts generated by the enterprise.
Partner	Natural persons or legal entities having an interest in the Company related to the joint development of new projects.