ABL Group

Policy 008. **Human Rights**

1. Purpose

The purpose of this document is to set out ABL Group's approach and commitment to human rights and how this is embedded in our processes and procedures.

Human rights are fundamental to ABL Group's core values of truth, safety, and sustainability.

ABL Group is committed to respecting human rights of our employees, across our operations internationally and across our value chain as set out in the United Nations Guiding Principles on Business and Human Rights.

ABL Group expects that all employees, suppliers, and business partners respect human rights and decent working conditions as set forth in this policy.

2. Roles and Responsibility

At ABL Group, a cross-functional ESG Steering Committee advises and supports the implementation of our approach. The Executive Management team provides guidance and support to the ESG Steering Committee. The Executive Management is the owner of this policy, and has the responsibility to initiate programs, actions and reviews; in order for each ABL Group company to be aware of their obligations and to comply with the requirements.

3. Definitions

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.

Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Decent working conditions safeguard human rights, health and safety in the workplace environment, and provision of a living wage.

4. Guiding Principles

ABL Group is committed to respecting human rights as set out in the:

- Universal Declaration of Human Rights, International Covenant on Civil and Political Rights (ICCPR) and International Covenant on Economic, Social and Cultural Rights.
- UN Guiding Principles on Business and Human Rights.
- The OECD Guidelines for Multinational Enterprises.
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILO Convention)
- The UN Global Compact principles.

5. Our Control Framework

Human rights are embedded into our group policies, corporate QHSE & risk management frameworks and processes. The corporate code of conduct (i.e., ABL way of doing business) advocates high standards of honesty, integrity and ethical behaviour in our daily business and expects all representatives of our company to conduct their daily business in a safe, fair, honest, respectful, and ethical manner.

The ABL Group Supplier Code of Conduct includes specific labour and human rights expectations for our suppliers and business partners.

The QHSE Framework is made up of a series of manuals and standard operating procedures, which are in line with ABL Group's policies and code of conduct. The framework applies to every ABL Group entity, including all employees, freelancers, and contractors. It defines the standards and accountabilities at each level of the organisation and sets out the procedures and processes they are required to follow. We require that all significant HSE risks associated with our business activities are assessed and managed to be as low risk as is reasonably practicable.

ABL Group provides mandatory human rights awareness training and regularly reminds employees about the importance of the Code of Conduct. We expect our suppliers and business partners to understand and meet our robust requirements.

6. Our Commitments

ABL Group is committed to developing an organisational culture and a relationship with our suppliers and business partners, that respects internationally recognized human rights and seeks to avoid human rights abuses.

We are committed to a workplace full of integrity, and fostering and protecting a corporate environment that is inclusive, safe, and professional.

ABL Group respects laws and regulations of the countries in which we operate. If local legislation conflicts with the requirements in this policy, ABL Group complies with local law while implementing relevant measures to ensure respect for human rights and decent working conditions.

i) Non-discrimination

The diversity and inclusion of the people with whom we work with is at a heart of our operations. ABL Group recognizes the value of equality, diversity and inclusion and is committed to ensuring equal opportunities and preventing discrimination and harassment in all forms. For more details, refer to Policy.004 Equal Opportunities.

ii) Prohibition of child labour

Child labour is not tolerated. ABL Group believes in and supports children's basic rights to education. The minimum employment age is the age of completion of secondary school, but never less than 18 years.

iii) Forced labour and modern slavery

ABL Group believes in a work relationship that is freely chosen and free from threats and is opposed to all forms of modern slavery. ABL Group shall not engage in nor support forced, bonded or compulsory labour, nor shall ABL Group require any form of deposit, recruitment fees or confiscate identification papers from our employees. For more details refer to Policy.012 Modern Slavery Act Statement

We set clear expectations to suppliers and business partners not to use child, forced, prison or compulsory labour.

iv) Freedom of association and the right to engage in collective bargaining

ABL Group recognises and respects the right to freedom of association and the right to collective bargaining in accordance with local laws and regulations. When operating in countries where this right is limited by law, we will seek to take mitigating action in line with local conditions and regulations.

We expect our suppliers and business partners to respect freedom of association and collective bargaining; to provide a safe, secure, and healthy workplace, and the provision of wages and benefits that meet or exceed the national legal standards.

v) Health, safety, security, environment (HSSE)

ABL Group will conduct its business in a manner that prevents harm to people, the environment, or assets. We are committed to creating a work culture where prevention of harm is a priority for everyone. For more details refer to Policy.007 QHSE.

vi) Right to privacy

ABL Group respects the right to privacy of those who entrust us with their personal data.

All of the above commitments form a part of our Code of Conduct and we expect our suppliers and business partners to understand and meet our requirements.

7. Due diligence

Key human rights elements are embedded into ABL Group policies, processes, and reporting tools, as well as being addressed explicitly in audits and reviews. ABL Group performs a risk-based due diligence of our operations and value chain. This enables us to assess, prevent, and address actual or potential adverse impacts on human rights and decent working conditions that ABL Group may cause, contribute to, or be linked to.

8. Whistleblowing

Suspected violations and complaints regarding breaches of this policy should be reported to your line manager or to ABL Group's formal whistleblowing channel. The whistleblower channel can be reached by sending an email to: auditchair@abl-group.com.

Our suppliers and business partners should provide workers with whistleblowing mechanisms where grievances related to the above topics can be logged confidentially.

9. Corrective measures

ABL Group is committed to having processes in place to take appropriate remediation actions in case we identify that we have caused or contributed to adverse impact on human rights.

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