



# HUMAN RIGHTS POLICY

2022

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## I. OBJECT

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Neoen operates in accordance with all applicable national laws and regulations as well as relevant local practices. Neoen recognizes, respects and contributes to the protection and promotion of all internationally recognized human rights. The Group continuously works to align its practices to the principles of the Universal Declaration of Human Rights, the UN Global Compact, and the European Charter for Safeguarding Human Rights.

The purpose of this policy is **to formalize Neoen's commitment to respect for human and labour rights.**

## II. SCOPE

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Neoen requires its employees to acknowledge and comply with this Human Rights Policy.

In addition, Neoen expects its suppliers, contractors, and subcontractors to share the same values with respect to human rights and to adhere to the same human rights standards – such as those of the Universal Declaration of Human Rights, and/or the UN Global Compact, and/or the European Charter for Safeguarding Human Rights, in particular the prevention of slavery, and child labour.

## III. PRINCIPLES

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This policy shall cover the following principles:

### - PROHIBITION OF FORCED LABOUR:

Neoen is strictly opposed to forced or compulsory labour. Participation in or benefit from forced labour, including bonded labour, debt bondage, forced labour in penitentiary institutions, slavery or human trafficking is not tolerated. All labour shall be voluntary, and workers shall be free to leave upon reasonable notice.

### - FAIR AND RESPECTFUL TREATMENT OF PEOPLE:

Neoen provides and promotes a workplace in which any form of harassment, discrimination, abuse, or degrading treatment is unacceptable. All workers, without distinction of age, race, ethnicity, colour, gender, disability, religion, political opinion, national origin, sexual orientation, civil status, social origin, education, experience, or any other condition are treated with equality, dignity, and respect.

### - CHILD LABOUR:

Neoen is opposed to the use of child and under-aged labour. Neoen will not allow or practise or support the exploitation of children.

### - FREEDOM OF ASSOCIATION:

Neoen respects employees' rights to associate freely, join worker's associations, as permitted by and in accordance with local law.

### - RESPECT OF COMMUNITIES:

Neoen is respectful of local communities, living in proximity to our projects and undertakes a range of engagement activities and benefit-sharing initiatives. Neoen's intent is to prevent any potential adverse effects of our operations on the human rights of these communities.

## IV. PROCEDURES AND CONTROL

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Neoen has implemented procedures and controls to ensure compliance with this policy:

### - NEOEN'S CODE OF CONDUCT:

All employees are required to sign and comply with Neoen's Code of Conduct, which specifically states: "*The Group emphasises its commitment to upholding fundamental human rights, particularly as embodied in the European Charter for Safeguarding Human Rights signed on November 4th, 1950.*"

### - DUE DILIGENCE PROCESS TO REGISTER SUPPLIERS AND CONTRACTORS

Prior to selection, Neoen asks its key suppliers to provide their HSE and quality certificates and results as well as their sustainable development report. Then, during the selection phase (RFP), key suppliers undertake to comply with the ESG and HSE clauses included in the contracts. The analysis of responses is supplemented by a third-party ESG assessments provider. If the key contractor or key supplier is not registered on this third-party platform, Neoen asks that the shortlisted companies in the final round undergo an ESG assessment.

### - WHISTLEBLOWING CHANNEL:

Neoen provides a whistleblowing mechanism for all Group employees. As stated in the Article 7 of Neoen's Code of Conduct, "*Any Employee of the Group who is aware of or suspects, in good faith, breaches of the Code of Conduct, or, more generally, any fraud or offence against relevant laws and regulations, is asked to report it immediately*" through the existing whistleblowing channel.

### - ENFORCEMENT

Any violation of human rights and/or refusal to engage in a process to implement corrective measures may lead to a termination of the agreement with the concerned suppliers and contractors and may trigger appropriate sanctions vis-à-vis our employees.

## V. DISTRIBUTION

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This policy shall be issued to all relevant counterparties, who are responsible for ensuring that Neoen's commitments are known and acknowledged by any stakeholder involved in our business.