

# Fidra Energy Human Rights Policy

## Purpose

Fidra Energy has a zero tolerance of human rights abuses in all forms. We respect all internationally recognized human rights, as set forth in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This commitment is endorsed by our Board of Directors and is integral to our corporate culture and operational practices.

We recognize our responsibility to understand and manage human rights risks within our own business and value chain. Accordingly, we implement ongoing human rights due diligence throughout our operations in line with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines).

This policy is part of the overall governance framework of Fidra Energy, reflecting the culture and values of the business promoted through the Code of Conduct and the ESG policy, and the structured approach to risk management as set out under the Enterprise Risk Management policy. Our expectations regarding human rights are communicated to all employees, contractors, suppliers, and business partners. Internally, the Policy is further reinforced through mandatory training on modern slavery and human trafficking to ensure a high level of understanding of these risks in our operations and in our value chain.

## Policy Principles

The following principles highlight how we expect the policy purpose to be achieved:

### Principle 1: A safe, healthy and secure workplace

The health and safety of all of our employees and contractors is paramount. More details of this can be found in our Health, Safety and Welfare Policy.

### Principle 2: A respectful work environment

We are committed to promoting fair and equitable treatment of all employees, contractors, customers and suppliers. We promote greater inclusion and diversity in our business and ensure our workplaces are free from discrimination, bullying and harassment. More details of this can be found in our People Policy.

### Principle 3: Zero tolerance of modern slavery

We have zero tolerance of human rights abuses and modern slavery in all its forms in both its business and supply chain. We comply with the Modern Slavery Act 2015 and all relevant human rights, human trafficking and modern slavery legislation in jurisdictions in which we operate. More details of this can be found in our Modern Slavery Act Statement, published every year.

### Principle 4: Alignment with international standards

We are committed to upholding the all internationally recognized human rights and align our processes with the international standards, specifically the UNGPs and OECD Guidelines. We are committed to complying with the laws and regulations of all countries where we operate. In situations where local laws restrict the full exercise of internationally recognized human rights, we strive to respect and promote these rights to the greatest extent possible within the local legal framework.

## Policy Implementation

To implement the four principles and our human rights commitments, we will:

- Prepare an annual health, safety and wellbeing plan setting out steps we intend to take to improve the health, safety and wellbeing of our employees and contractors.
- Prepare an annual people plan setting out the initiatives we intend to take forward to promote the values and culture of the business, and promote diversity and inclusion, and our commitments to each other.
- Conduct an annual human rights risk assessment to identify and assess potential and actual human rights impacts within our operations and value chain.
- Formulate an action plan to prevent or mitigate the identified impacts, integrating findings into our decision-making process.
- Engage with stakeholders, including potentially affected groups, in identifying negative human rights impacts and developing actions to address these.
- Collaborate with suppliers during selection, onboarding and ongoing cooperation to ensure adherence to our human rights standards, including those outlined in purchasing clauses, in line with Fidra Energy's commitment to responsible sourcing stipulated in the Procurement Policy.
- Publish an annual modern slavery statement outlining the actions we have taken to address modern slavery in all forms in own operations and the value chain, and assess the effectiveness of these actions.
- Regularly assess international developments and guidelines to adopt the best practice in identifying and managing human rights issues.
- Provide for or cooperate in remedying negative impacts Fidre Energy has caused of contributed to through legitimate processes, and work with business relationships to mitigate impacts directly linked to our operations.

## Policy Monitoring and Enforcement

Fidra Energy is committed to providing accessible and effective grievance mechanisms to address human rights concerns. If an employee or a third party becomes aware of anything that falls short of our standards of conduct and/or which amount to an abuse of human rights, they are encouraged to report this. To facilitate this, we have established multiple reporting channels, including:

- An independent third-party reporting platform, Safecall ([www.safecall.co.uk/report](http://www.safecall.co.uk/report)), either online (link) or through telephone on 0800 915 1571
- Direct reporting to your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise the concern with the HR department.

Further details about Fidra Energy's grievance mechanism and how concerns are addressed are set out under our Whistleblowing Policy, available here ([Whistleblowing-Policy.pdf](#)) on our website.

We ensure that all reports are treated with confidentiality, and individuals raising concerns in good faith are protected from any form of retaliation. Any suspected breach of this policy will be investigated and,

if proven, will result in action being taken under our disciplinary procedure. Fidra Energy takes any potential breach of human rights very seriously.

We are dedicated to continuous improvement and will regularly review and update our grievance mechanisms to ensure they remain effective and aligned with international best practices.

### Roles and Responsibilities

| Role        | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Group Board | <ul style="list-style-type: none"><li>Approves this policy and reviews annual performance</li></ul>                                                                                                                                                                                                                                                                                                                                                                                         |
| CEO         | <ul style="list-style-type: none"><li>Reviews policy annually</li><li>Promotes and ensure business wide compliance with this policy</li></ul>                                                                                                                                                                                                                                                                                                                                               |
| HR Director | <ul style="list-style-type: none"><li>Prepares this policy</li><li>Responsible for the implementation and communication of this policy</li></ul>                                                                                                                                                                                                                                                                                                                                            |
| Employees   | <ul style="list-style-type: none"><li>Adhere to this policy, the Procurement Policy and associated policies</li><li>Promptly report any known or suspected violations of this policy to the CEO or, if anonymity is preferred, to the Whistleblowing Helpline</li><li>Seek assistance from the CEO, Finance Team or a member of the Executive Team when in doubt of the requirements of this policy or how to handle a situation that could potentially conflict with this policy</li></ul> |
| Managers    | <ul style="list-style-type: none"><li>Adhere to and ensure team compliance with this policy and associated policies</li></ul>                                                                                                                                                                                                                                                                                                                                                               |

### Associated Policies and Procedures

- Code of Conduct
- Enterprise Risk Management Policy
- ESG Policy
- People Policy
- Health, Safety and Welfare Policy
- Procurement Policy
- Anti-fraud and anti-bribery framework
- Whistleblowing Policy
- Modern Slavery Statement

### Records

Personal data will be retained in accordance with applicable data protection legislation. Further information can be found in our privacy notices.

### Document History

| Version     | Date       | Author | Comments                                     |
|-------------|------------|--------|----------------------------------------------|
| Version 1.0 | 25.11.2024 | CEO    | FE Policy Developed                          |
| Version 2.0 | 04.12.2024 | CEO    | Updated following review by external adviser |