



Human Rights Policy



Document manager: Chief Communications and Sustainability Officer
Approved by: Board of Directors
Date: 6 May 2026

1. Purpose

The purpose of the Human Rights Policy is to set guidelines and rules for how the Eolus group of companies ("Eolus") work to respect human rights and our approach to manage associated risks.

Human rights are defined as universal rights, inherent to all human beings, regardless of race, gender, nationality, ethnicity, language, religion, or any other status. Human rights shall be applied equally and universally and everyone is entitled to these rights, without discrimination.

Eolus bases the human rights definition and responsible business practices on:

- the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- the United Nations (UN) Declaration on the Rights of Indigenous Peoples, UNDRIP
- the UN Guiding Principles on Business and Human Rights
- the Organisation for Economic Co-operation, and Development (OECD) guidelines for Multinational Enterprises on Business and Human Rights
- the International Labour Organizations (ILO's) eight core Conventions
- the principles of UN Global Compact.

2. Policy Statement

Eolus recognises that our business activities may have an impact on society, the environment and biodiversity. We strive to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts when they occur. We also seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts.

Our commitment to respecting human rights

Eolus supports, respects and promote internationally recognized human rights standards throughout our entire value chain.

Our commitment applies to all rightsholders, which include but are not limited to all our employees, employees of our suppliers and contractors in our whole supply chains, customers, environmental and human rights defenders, local communities and indigenous peoples along our value chain.

In cases when local law and international human rights standards differ, we strive to follow the higher standards while complying with local laws. In case of direct conflict between the two, we will seek ways to honour the principles of internationally recognised standards.

As an employer we are committed to offering a safe and healthy work environment that actively works against discrimination and any form of harassment. We promote diversity and equal opportunities with reasonable working hours, salaries and benefits aligned with international standards and support the right to organize and collective bargaining.

As a buyer of goods and services we require decent working conditions in our supply chain, including no harm or injuries, wages to meet basic needs, reasonable working hours, the right to organize and collective bargaining. Eolus has zero tolerance regarding any form of child labour, modern slavery including forced labour, discrimination, harassment and corruption. We engage with business partners

and suppliers who are committed to respecting human rights in their activities, including in their own supply chains.

As a renewable energy project developer, we are committed to engaging with relevant stakeholders throughout the different phases of a project and providing opportunities for dialogue and collaboration regarding issues that (may) impact local communities. When Indigenous Peoples reside and work in areas of project development, we will always strive to obtain Free, Prior and Informed Consent (FPIC). We prioritize supporting local social- and/or environmental initiatives. Secondly, we prioritize regional initiatives.

We recognize that vulnerable groups need special attention, and these groups may differ depending on the local context, e.g. in which sector they work and employee status. Vulnerable groups can be, but is not limited to, children, women, indigenous peoples, temporary- or migrant workers, people with disabilities and minorities. We commit to giving these groups special attention in our own activities by addressing relevant groups accordingly and by requiring our supply chain to adhere to Eolus's Code of Conduct for suppliers and business partners.

We are committed to cooperating in remediation processes in situations where Eolus activities cause or contribute to adverse human rights impacts.

We strive to implement this Human Rights Policy by adhering to the six steps of human rights due diligence as described in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. This is an ongoing process, as we recognize that the human rights risks may change over time as our business operations and operating context evolve.

Eolus will in our annual sustainability report disclose the progress of the implementation of this policy.

Eolus's Code of Conduct, Code of Conduct for Suppliers and Business Partners, HR Policy, Guideline for Diversity and Inclusion, and Guidelines for indigenous peoples' rights provide more details on our commitment to protecting human rights.

3. Relevant Entity

This policy applies to all employees of all legal entities within the Eolus group of companies.

4. Roles and Responsibilities

The CEO is responsible for this policy. The policy is approved by the Board of Directors and reviewed annually.

Document Manager:

- prepares annual updates of the policy in Q2
 - o ensures the policy is clear, consistent, and aligned with corporate governance requirements
 - o removes outdated or redundant content
 - o submits the policy for approval
- publishes the policy on Eolus Intranet (/About Eolus/Corporate Governance)

- implements the policy by specific training sessions or other appropriate communication activities, and
- monitors policy compliance.

5. Exceptions

Any exceptions to this policy must be clearly defined and documented. All exceptions must be approved by the Board of Directors.

6. Monitoring of Compliance

The following measures shall be taken by the Document Manager to ensure that the objectives of the policy can be met:

- Annual confirmation that:
 - o the guidelines have been timely updated, and
 - o specific training sessions or other appropriate communication activities have been held.
- Quarterly confirmation that
 - o no human rights violations have occurred during this reporting period.

7. Reference List

In the creation of this policy, the following references have been used:

- The Universal Declaration of Human Rights (UDHR) <https://www.un.org/en/about-us/universal-declaration-of-human-rights>
- The UN Guiding Principles on Business and Human Rights https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf
- OECD Guidelines for Multinational Enterprises <https://www.oecd.org/daf/inv/mne/48004323.pdf>
- International Labour Organization, specifically the following documents (<https://ilo.org>):
 - o Forced Labour Convention 1930 (C.29)
 - o Freedom of Association and Protection of the Right to Organise Convention 1948 (C.87)
 - o Right to Organise and Collective Bargaining Convention 1949 (C.98)
 - o Equal Remuneration Convention 1951 (C.100)
 - o Abolition of Forced Labour 1957 (C.105)
 - o Discrimination (Employment and Occupation) Convention 1958 (C.111)
 - o Minimum Age Convention 1973 (C.138)
 - o Worst Forms of Child Labour Convention 1999 (C.182)
 - o UN Global Compact <https://unglobalcompact.org/>
 - o Free, Prior and Informed Consent – An Indigenous People’s right and good practice for local communities <https://www.fao.org/3/i6190e/i6190e.pdf>
- Eolus Guidelines for respecting Indigenous Peoples Rights
- The United Nations Human Rights | United Nations
- Eolus’s Code of Conduct
- Eolus Code of Conduct for Suppliers and Business Partners