

ENERGO-PRO Group

Human Rights Policy

2026



HUMAN RIGHTS POLICY (THE "POLICY")

1. Introduction

The core business of ENERGO-PRO a.s. ("ENERGO-PRO") and its subsidiaries (collectively "the Group") is renewable energy generation. The Group's additional activities include electricity distribution, supply and trading.

ENERGO-PRO upholds the principles in the United Nation's Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights (VPSHR) and the declaration of the International Labour Organization on Fundamental Principles and Rights at Work. Our approach to Human Rights is extended to our value chain.

2. Objectives

The objectives of the Human Rights Policy are:

- To respect and demonstrate Good International Industry Practice (GIIP) regarding human rights.
- To provide a framework for embedding the responsibility to respect human rights throughout the organization.
- To build leadership accountability.
- To demonstrate to our partners and stakeholders our commitment to respecting human rights and build trust.

3. Governance

ENERGO-PRO's Group and Subsidiary Board of Directors are accountable for ensuring the implementation of this policy. Senior management is responsible for monitoring significant human rights risks associated with the Company's activities and for ensuring that the Policy is integrated into relevant business processes and operations.

ENERGO-PRO seeks to continuously improve its human rights management approach through regular review of its policies, procedures and practices.

4. Scope

The Policy applies to all employees and our Value Chain.

This Policy applies to ENERGO-PRO, ENERGO-PRO's subsidiaries operating in Bulgaria and Georgia and the subsidiary Murat Nehri Elektrik Üretim A.Ş. operating in Türkiye.

It also applies to all other subsidiaries of ENERGO-PRO, which may however request the Group Board of Directors to approve an opt-out from specific provisions of this Policy. The Group Board of Directors may approve such a request where it is satisfied that the opt-out is based on objective and commercially reasonable grounds and, further, is consistent with local law, the Group Code of Conduct and binding financing commitments. Approved opt-outs will be documented and shared with the Group ESG Department.

We expect those working with and for us to uphold equivalent standards and may seek to assess alignment with these principles as part of our business processes.

5. Policy Statement

“Respecting human rights is embedded in our values and our Global Code of Conduct. We demonstrate our commitment to human rights by making our leaders accountable, proactively asking the right questions and conducting due diligence activities to identify and prevent negative human rights impacts in our operations. We ensure that our workers understand that human rights start with them and are a part of our decision making and daily activities. We recognize the responsibility to “do no harm”. Our Board of Directors, Supervisory Board and Senior Management will monitor and respond to any breach of this policy.”

6. Principles

The following principles have been established based on an assessment of ENERGO-PRO's salient human right risks.

- Resettlement: We recognize the right to a comprehensive participatory consultation process and fair, just and adequate compensation for individuals and communities impacted by resettlement. We respect land ownership and interests established by law and/or recognized customs and the right to adequate housing for those impacted by physical displacement.
- Community Engagement: We recognize the right to a comprehensive participatory and fair consultation process. ENERGO-PRO is committed to providing appropriate channels through which communities and other stakeholders may raise concerns through our Grievance Mechanism Standard. We react promptly to stakeholder concerns and grievances and provide remediation measures that are proportionate to the significance and the scale of the impact. We also respect cultural heritage established by law and/or recognized customs. We work to maximize the benefits and reduce the negative impacts of our activities on affected communities. Our Group Stakeholder Engagement Standard provides additional guidance regarding stakeholder engagement.
- Indigenous Peoples: We recognize this as a salient human Rights issue if we were to operate, in the future, in projects impacting indigenous peoples'. We respect indigenous peoples' individual and collective rights, their connection and ownership to lands, their self-determination, cultural preservation, protection from discrimination and violence and connection to waters and we uphold the UN Declaration on the Rights of Indigenous Peoples.
- Environmental Rights: We recognize the right to an adequate environment, including access to information and the right to a participatory process and decision making regarding environmental matters. As a first step, we avoid and minimize environmental impacts when technically and financially feasible and we incorporate mitigation measures in the design phases of our projects. We compensate adequately for environmental impacts and restore sites and ecosystems adequately.
- Labour and Value Chain: We recognize the rights of workers to a safe occupational health and safe environment, the rights of migrant workers, adequate working conditions including hiring, firing, promotion and remuneration, employment due process, fair and equal treatment, an environment free from harassment and the rights to freedom of association. We reject all types of discrimination, including gender discrimination, and promote an inclusive and diversified approach to hiring, promotion and remuneration. Our employees and our value chain may raise concerns related to human rights through the Company's grievance and whistleblowing mechanisms, as described in the corporate policies and procedures. These mechanisms are intended to ensure that concerns can be raised confidentially and without fear of retaliation. The

Company will review concerns raised through these channels and, where appropriate, take steps to address and remediate adverse human rights impacts.

- **Child, Forced Labour and Modern Slavery:** We respect minimum age standards in hiring practices according to local laws. We avoid hiring workers into bonded labour relationships including salary advances or loans, we do not withhold wages or benefits in an attempt to coerce favours or additional work from employees. All work is freely chosen, without the use of forced or compulsory labour. Termination of contracts are communicated to workers, and all salary and benefits are paid, in compliance with local regulations.
- **Security and Conflict:** We provide human rights awareness training to our security contractors, including guidance on appropriate behaviour when interacting with partners and stakeholders. We conduct due diligence on all security contractors before awarding contracts. In our engagements, we promote open communication, peaceful conflict resolution, and consensus building. We also enforce strict controls on the use of force and minimize the use of firearms on our sites whenever possible. The use of force shall be proportional, lawful and strictly limited to situations where it is necessary to protect life or prevent serious harm.
- **Anti-Corruption:** We believe in taking an active stand against bribery and money laundering. We behave with integrity and ethically when conducting business with our partners and stakeholders.
- **Customers:** One of our business pillars is the distribution and sale of electricity to end-users, We strive to provide high quality services and address customer complaints promptly and responsibly through our external Grievance Mechanism.

7. Human Rights Due Diligence

ENERGO-PRO seeks to identify, prevent and mitigate adverse human rights impacts associated with its business activities and value chain.

As part of this commitment, the Company integrates human rights considerations into relevant corporate processes. This includes:

- Assessing potential and actual human rights risks and impacts.
- Integrating findings into internal decision-making processes.
- Monitoring the effectiveness of mitigation measures; and
- Addressing impacts where the Company has caused or contributed to them.

8. Communication

Human rights are embedded across our Code of Conduct, internal Policies, and our Sustainability Framework. We communicate these expectations at least once a year to all employees and our value chain through multiple channels, including onboarding programs, training sessions, our corporate website, email and SMS updates, office posters, contractor agreements, and other communication tools.

In addition, every Business unit is required to demonstrate how they integrate and comply with this policy including training on human right, management of salient human rights issues, the execution of human rights due diligence, and the communication of these expectations throughout our value chain.



9. Distribution

This document is available on the company website, incorporated in selected standard terms and conditions of business, and may be reviewed regularly based on feedback from our stakeholders and in response to regulatory changes.

10. Entry into Force

This version of the Policy enters into force and is effective on and from May 2026.