



Human Rights

Protection Policy

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Version	Date
2	4 May 2026
1	6 February 2023

Introduction

Respect for human rights is our core value and an integral part of responsible business conduct. Respect for the dignity of every individual is not only a legal obligation, but also a key element in building trust and lasting relations with our employees, business partners and the communities we operate in.

Our Policy is based on:

- the UN Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- the Conventions of the International Labour Organisation,
- the Universal Declaration of Human Rights,
- the Charter of Fundamental Rights of the European Union,
- other recognised international documents and standards.

The Policy is an integral part of our Integrated Management System. It complements and reinforces existing internal regulations, including the Code of Ethics, Remuneration Policy, Prevention of Sexual Harassment Policy, Sustainable Business Policy and the Code of Conduct for Business Partners.

It also forms part of a due diligence system in line with the UN and OECD guidelines – covering, in particular, the periodic identification of risks, assessment of their relevance, implementation of preventive measures and monitoring of the effectiveness of these measures across the entire value chain. We expect our suppliers, customers, business partners and other entities with whom we cooperate to familiarise themselves with its content and to comply with the principles set out therein.

Purpose and scope

The purpose of the Policy is to ensure respect for human rights in all our operations and relations – both within the company and across the entire value chain.

The Policy applies to:

- all companies within the Eneris Group,
- all employees and associates,
- suppliers, subcontractors, customers and business partners, to the extent that the Policy has been communicated to them or incorporated into existing contractual relations,
- local communities and all persons affected or potentially affected by our operations.

Our commitments

We create a work environment based on respect, equality and safety, fostering responsible relationships with our employees, associates, business partners and local communities. Our commitments cover all areas of human rights protection over which we have influence, implemented through clearly defined standards, preventive measures and the continuous improvement of our practices.



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Respect,

equality & safety

foundations of our work culture



Fair remuneration and employment conditions: We ensure fair and transparent remuneration, timely payment and equal pay for work of equal value. We guarantee respect for working hours and rest periods, and provide support in unforeseen circumstances.

Occupational safety and health: We ensure safe and healthy working conditions through training, personal protection equipment and clear procedures for reporting hazards. We regularly monitor OSH risks and implement measures to reduce accident rates.

Right to health, including mental health: We care for the physical and mental wellbeing of our employees by identifying and mitigating psychosocial risks. We create a work environment that fosters a sense of safety and comfort, providing access to preventive and educational initiatives, as well as private medical care.

Freedom of association and social dialogue: We enable employees to freely form and join employee organisations. We maintain a constructive and regular dialogue with trade unions and employees' representatives, based on respect and transparency.

Protection against violence and mobbing: We do not tolerate any form of violence, mobbing or harassment. We provide safe procedures for reporting irregularities and protection of whistleblowers, responding to any behavior that is contrary to our values. We regularly train our employees in this area.

Prohibition of child labour, forced labour and human trafficking: We do not tolerate child labour, forced labour or human trafficking. In cases of violations, we take firm corrective action and cooperate with the relevant authorities to protect individuals affected by such abuse.

Non-discrimination and equal treatment: We ensure a work environment that is free from discrimination and offers equal opportunities for development to all employees. We ensure that workplaces and processes are accessible to people with disabilities and promote an atmosphere built on mutual respect and openness to diversity.

Respect for local communities: We engage in dialogue with communities, minimise any inconvenience associated with our operations, and support development initiatives, including educational programmes. We pay particular attention to the needs of vulnerable groups.

Right to live in a clean environment: Through our waste management operations, we contribute to maintaining a clean environment. We limit negative impacts, monitor our environmental footprint and apply solutions to minimise, among other things, emissions, noise and odours. We implement the best available technologies to ensure our operations comply with the highest environmental standards.

Protection of property and avoidance of forced evictions: We carry out our investment processes with respect for property rights, transparency, and dialogue with those who may be affected. We avoid actions that could lead to forced evictions.

Responsible conduct of security services: We require security companies to fully respect human rights and treat all individuals ethically. We monitor how services are delivered, preventing abuse and improper practices.

Protection of privacy and personal data: We respect the right to privacy of all individuals who may be affected by our operations. This includes the protection of personal data, as well as other aspects of privacy in the workplace.

Communication channels and reporting violations

We are open to any information and dialogue regarding our impact on all areas of human rights. Our stakeholders are provided with access to communication channels that enable anyone to report violations of this Policy, concerns, appeals or proposals for corrective action. This process is free of charge, anonymous, accessible and impartial, with its purpose being to resolve disputes at an early stage. We are committed to taking appropriate corrective action in accordance with the principles set out in the Sustainable Business Policy.

Reporting comments, complaints, or observed irregularities related to Eneris's operations can be made through the following communication channels:

- via the electronic reporting form available on the website <https://eneris.pl/etyka/>
- by email to: etyka@eneris.pl
- by telephone at: **+48 735 587 113**
- in person, by meeting with the **Ethics Officer** or the **Chair of the Ethics Committee**
- in paper form, sent to the correspondence address: ul. Koszykowa 65, 00-667 Warszawa, marked "for the attention of the Ethics Officer" or "for the attention of the Chair of the Ethics Committee".

All reports are treated confidentially and are subject to review and response procedures in accordance with the Eneris Code of Ethics and the Rules of the Ethics Council. We guarantee full protection of whistleblowers against retaliation, as well as the timely and impartial handling of reports.



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We build a culture of responsibility

through accessible reporting
channels, transparent oversight
and systematic monitoring
of standards

Policy management

The Management Board is responsible for implementing the Policy, shaping the approach of Eneris companies to human rights, and overseeing risks and impacts in this area. The Management Board's responsibilities include, in particular:

- approving directions and objectives related to human rights,
- overseeing the due diligence system,
- periodically reviewing the implementation of the Policy and reporting outcomes.

The Chair of the Ethics Committee, together with the Ethics Committee, performs a supervisory function. Their responsibilities include:

- monitoring compliance with the Policy,
- analysing reports and recommending corrective action,
- supporting the development of an ethical culture within the organisation.

Managers of organisational units as well as persons in charge of environmental risk management, OSH, HR and procurement are responsible for implementing the Policy in daily operations.

Monitoring and review

We commit to regularly monitoring compliance with this Policy across all Group companies and throughout the supply chain. To this end, we conduct periodic audits, analyse performance indicators, and report the results to the Management Board and as part of our annual sustainability reports. In the event that irregularities are identified, we take corrective action and improve our procedures. The Policy is subject to cyclic review and updates to reflect changes in legislation, international standards, and best market practices.

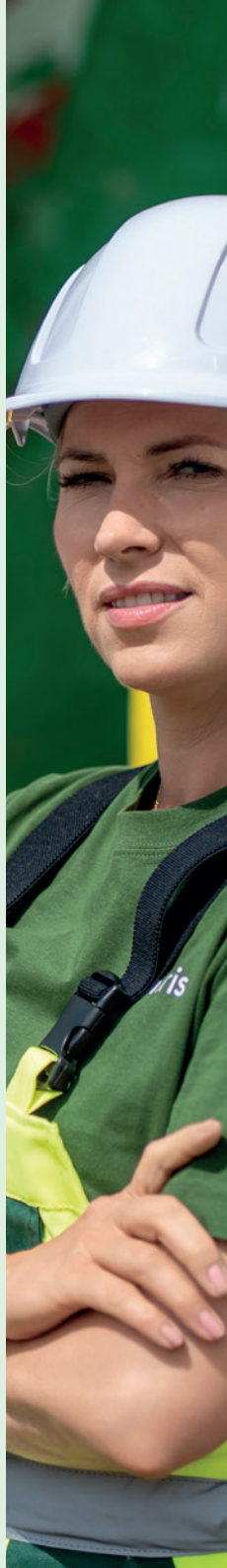
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