



Human Rights Policy

FARIA Renewables S.A.

1. Introduction & Purpose

At FARIA Renewables S.A., we believe that respect for human rights is a fundamental responsibility and a cornerstone of sustainable growth.

This Policy sets out how we identify, prevent, mitigate, and remedy adverse human rights impacts across our operations, projects, and supply chains.

It is guided by the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises.

2. Scope of Application

This Policy applies to all employees, directors, officers, contractors, subcontractors, suppliers, consultants, and joint venture partners.

It also extends to communities and stakeholders impacted by our renewable energy projects.

3. Our Commitments

- **Non-Discrimination & Equal Opportunity:** We prohibit discrimination and harassment based on gender, race, age, religion, disability, sexual orientation, or any other protected characteristic.
- **Health, Safety & Working Conditions:** We commit to providing safe and healthy working environments, complying with HSE standards in all offices and construction sites.
- **Freedom of Association:** We respect the right of employees to join trade unions and engage in collective bargaining.
- **Fair Labor Practices:** We prohibit child labor, forced labor, and exploitation. We commit to fair wages, reasonable working hours, and ethical treatment.
- **Community & Land Rights:** We respect local and indigenous communities' rights. We uphold Free, Prior and Informed Consent (FPIC) in projects affecting traditional or indigenous lands.



- **Privacy & Data Protection:** We protect personal data in compliance with GDPR and other applicable laws.
- **Diversity, Equity & Inclusion:** We value diversity and inclusivity in our workforce and management, ensuring equal opportunities for all.

4. Acceptable / Unacceptable Behaviors

- **Acceptable:** Treat colleagues, communities, and stakeholders with respect and dignity; comply with health, safety, and labor laws; protect confidential and personal data.
- **Unacceptable:** Discrimination, harassment, forced labor, child labor, unsafe practices, breach of privacy, ignoring local community rights.
- **What to do if:** Report incidents or concerns immediately to HR, Compliance, or through whistleblowing channels.

5. Implementation & Due Diligence

We integrate Human Rights Impact Assessments (HRIA) in every project lifecycle.

We conduct supplier due diligence and require compliance with our Supplier Code of Conduct.

We monitor and audit compliance regularly, with corrective action plans where needed.

We engage proactively with communities and stakeholders to ensure transparency and trust.

6. Monitoring & Accountability

The ESG Committee oversees the implementation of this Policy and reports annually to the Board of Directors.

KPIs include: number of grievances raised and resolved, supplier audit results, HRIA outcomes, training completion rates.

Progress and actions will be communicated transparently in our sustainability reports.



7. Training & Awareness

All employees, contractors, and suppliers will receive training on this Policy.

Refresher sessions will be conducted regularly to ensure ongoing awareness and compliance.

8. Declaration of Commitment

This Human Rights Policy is endorsed by FARIA Renewables S.A.'s Board of Directors and applies to all operations and business relationships.

By embedding respect for human rights, we aim to contribute to a just, inclusive, and sustainable energy transition.

Approved and signed by

Efthalia Valkouma
President and CEO

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Dimitrios Kintsakis
Vice President and CEO

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Annex: Human Rights Policy – Extended Operational Guide

a. KPIs & Metrics

- % of employees trained on human rights policy
- Number of grievances received and resolved
- % of supplier audits passed on labor & H&S standards
- Human Rights Impact Assessments (HRIAs) conducted per project
- Community engagement sessions held annually

b. Practical Scenarios – Acceptable / Unacceptable / What to do if

Example 1 – Child Labor in a Supplier

- Acceptable: Supplier has transparent hiring practices; audits confirm compliance with ILO standards.
- Unacceptable: Hiring of underage workers in construction or manufacturing.
- What to do if: Immediately report to Compliance; suspend supplier pending corrective action.

Example 2 – Community Engagement

- Acceptable: Holding public consultations, documenting concerns, adjusting project design accordingly.
- Unacceptable: Ignoring local opposition or bypassing community leaders.
- What to do if: Raise concerns with ESG Committee; escalate to Board if unresolved.

c. Reporting & Transparency

- Annual disclosure in ESG/Sustainability Report.
- Public communication of progress on human rights KPIs.
- Commitment to continuous improvement and alignment with international best practices.