

## Human Rights Statement

SEFE (SEFE Securing Energy for Europe Holding GmbH, SEFE Securing Energy for Europe GmbH (SEFE) and its subsidiaries) aims to be an attractive employer, reliable partner and good neighbour, which is why we respect human rights, care for our staff members, and are dedicated to the local communities where we operate.

Respect for human rights is integral to our company culture and forms the basis for our responsible business, every day and in every business operation. We are committed to respecting, safeguarding and ensuring adherence to human rights both at our company and along our value chains. For clarity's sake, the same applies in relation to our commitments and obligations to promote and protect environmental standards in our own operations and supply chains, which is covered separately in our Environmental and Climate Change Statement.

### Our Commitment to Respect All Internationally Recognised Human Rights

We expressly endorse, respect and support all internationally recognized human rights across all our business activities in accordance with:

- The Universal Declaration of Human Rights<sup>1</sup> adopted by the UN General Assembly in Paris on 10 December 1948
- The ILO Declaration on Fundamental Principles and Rights at Work<sup>2</sup> adopted in 1998 and amended in 2022

We acknowledge and align our business activities with international standards, including:

- The United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the United Nations Global Compact
- The OECD Guidelines for Multinational Enterprises
- The UK Modern Slavery Act
- The German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz)

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<sup>1</sup> Consisting of the Universal Declaration of Human Rights and the two 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

<sup>2</sup> The International Labour Organization's Declaration on the Fundamental Principles and Rights at Work, including freedom of association, the right to collective bargaining, and the rights not to be subject to forced labor, child labour or discrimination in respect of employment and occupation.

## The Scope of Our Statement

This Statement applies to all staff members and contractors of SEFE. We also expect that all our contractors, suppliers and other partners in our value chains share our values and follow the spirit and intent of this Human Rights Statement.

## Our Focus Areas

### Working Conditions

- We are committed to respecting the rights of staff members and workers in our value chains to fair and respectful working conditions, including fair compensation;
- we clearly reject any form of child or forced labour;
- we ensure a safe, healthy and secure work environment for all staff members and contractors;
- we do not tolerate any form of discrimination or harassment;
- we promote diversity, equity and inclusion to ensure equal opportunities for all staff members; and
- we support the rights of freedom of association, freedom of peaceful assembly, and freedom of collective bargaining.

### Local Communities

We endeavour to minimise adverse physical, social and environmental effects on local communities and indigenous peoples in the areas where we operate. Accordingly, we aim for open dialogue with the local communities, establishing positive engagement and providing helpful support.

### Responsible Partnerships

When selecting our business partners, we evaluate – where appropriate or required – their commitments, processes and performance in terms of health, safety, environmental and social standards as well as their adherence to fair business practices.

To maintain the quality of our supply chain, we will examine our partners to the extent necessary and appropriate for Environmental-, Social- and Governance-related (ESG) risks, including human rights risks, and collaborate to define appropriate mitigation measures. Any higher-risk suppliers identified may require additional assessments and inquiries.

## Our Approach to Governance and Implementation

### Governance

At SEFE, senior management set the clear expectation that all staff have a responsibility to uphold our commitments to respect human rights. This task will be embedded in our business processes and activities, including our Know-Your-Customer (KYC) reviews of new counterparties.

SEFE takes its commitment and obligations seriously to promote and protect human rights in our own operations and supply chains, including in accordance with the German Supply Chain Due Diligence Act. Additionally, our Code of Ethics and Business Conduct, HR policies and other internal company policies complement and reinforce this Statement.

The SEFE Supervisory Board, assisted by the ESG Committee and other committees, is equally committed to ensuring adherence to our human rights commitments and monitoring implementation of human rights-related policies and practices within SEFE. SEFE Management Council and the senior management team are responsible for the implementation of human rights due diligence processes as well as for ensuring that all related risks are properly addressed and that any breaches are investigated and remediated.

SEFE Risk Management committees ensure that human rights risks are considered in SEFE's global risk management processes.

A Human Rights Officer has been appointed to monitor human rights risks across SEFE and within its supply chains, and reports regularly to the Management Council.

### **Due Diligence Process**

To ensure compliance with our commitments, we will implement an ongoing due diligence process to identify, address, evaluate and communicate the risks of adverse human rights impacts in our operations and supply chains. It is our intention to update our due diligence processes continuously and adapt them to changed circumstances. This process involves:

- Identifying human rights risks, including weighting and prioritising these risks, through regular risk analysis as well as on an ad-hoc basis, if needed;
- addressing these risks through effective preventive measures and appropriate remedial measures in case of violations;
- embedding these measures in all relevant business processes;
- regularly monitoring the effectiveness of our preventive and remedial measures as well as of our grievance mechanisms.

### **Risk Analysis**

In order to identify human rights risks at an early stage, we will conduct an ongoing risk analysis of our own business operations and our supply chains considering country- and industry-specific risks as well as risks associated with specific products. This risk analysis will also incorporate any information received through our complaints process.

We will prioritise the most salient risks and seek to consult with potentially affected groups and other relevant stakeholders, whenever possible, to develop adequate risk-mitigation strategies. We expect that a trust-based dialogue on human rights topics will help us to deal more openly and efficiently with any critical situations.

### **Preventive and Remedial Actions**

We take great care to prevent any violations from occurring. If a human rights concern is detected in our own business, we will act immediately and appropriately to remedy the situation and the violation.

If a human rights concern occurs in our supply chain, we expect our partners to take immediate remedial action and communicate the outcome to us. In the event that immediate mitigation or cessation of the violation is not possible, we will aim to agree with the partner on a corrective action plan and consider all other required and appropriate actions.

We will regularly monitor the effectiveness of preventive and remedial measures in both our own business and in our supply chains.

### **Training and Awareness-Raising**

We believe that raising awareness of human rights and promoting continuous learning are essential for nurturing a culture of respect for human rights within SEFE. This, in turn, enhances our risk awareness and facilitates mitigation actions in line with our existing SEFE Code of Ethics and Business Conduct.

To strengthen our staff members' understanding of their responsibility regarding human rights, we will reinforce our compliance training programmes accordingly.

In our procurement activities, we will communicate and, over time, strengthen our human rights expectations through increased requirements for partners, e.g. by strengthening our onboarding and management processes.

### **Grievance Mechanisms**

At SEFE, we are committed to maintaining high standards of openness and accountability. Therefore, we strongly encourage our employees and partners to speak up if they feel that something is "not right", including any form of potential human rights violation.

We offer special channels for raising concerns for both SEFE staff members and external partners, including staff members of partners in our value chains and members of local communities. In addition to the ability to contact us in person, we have established a whistleblowing channel (detailed information and the options for submitting concerns can be found on our website). After receiving any grievances, we immediately take great care to address the situation and provide appropriate remediation while ensuring confidentiality and anonymity.