POLICY ON RESPECT FOR HUMAN RIGHTS

The Management of Paramount Panels is responsible for design, assess and continuously revise the Management System, and specifically to approve and update the policy, which contain the guidelines governing the conduct of the PPUK is the controlling entity, within the meaning established by law.

In fulfilling these responsibilities and aware that respect for human rights is one of the main pillars on which the purpose and values of the PPUK an aspect that is inextricably linked to the United Nations 2030 Agenda for Sustainable Development, the Management hereby approves this *Policy on Respect for Human Rights* (the ***"Policy"***), which has been prepared taking into account the most stringent international standards.

1. Purpose

The purpose of this *Policy* is to formalise the PPUK commitment to the human rights recognised in domestic and international legislation and to define the principles that the PPUK will apply for due diligence in the area of human rights pursuant to the *Guiding Principles on Business and Human Rights,* the *OECD Guidelines for Multinational Enterprises,* the principles underpinning the *United Nations Global Compact,* the *Tripartite Declaration of Principles Concerning Multinational Enterprises* and *Social Policy,* the conventions of the International Labour Organization (including convention 169), the Sustainable Development Goals (SDGs) approved by the United Nations.

2. Scope of Application

This *Policy* applies to entire Paramount Panels Organisation

3. Main Principles of Conduct

In order to achieve the objectives and commitments set forth above, the PPUK adopts and promotes the following main principles of conduct, which must inform its activities in all areas:

a) identify potential impacts that the PPUK operations and activities might have on human rights, either directly or through third parties;

b) have a due diligence system that identifies situations and activities with a higher risk of violating human rights, in order to develop mechanisms for the prevention and mitigation of such risk and to redress the impacts if they occur;

c) evaluate the effectiveness of the due diligence system on a regular basis by monitoring, with a special focus on those centres of activity in which there might be a higher risk of violating human rights.

d) report the results of the evaluation of the effectiveness of the due diligence system in its annual public information, available on the PPUK website;

e) advance a culture of respect for human rights and actions intended to promote awareness-raising in this field among its professionals within PPUK;

f) adopt as soon as possible such measures as may be applicable in the event of detecting any violation of human rights at the facilities of PPUK or of its suppliers, and report thereon to the competent government authorities in order for them to take any appropriate action if such violation may amount to an administrative, criminal or any other type of offence.

4. Human Rights Regulatory Framework

In addition to this *Policy,* the following also form PPUK regulatory framework on respect for human rights:

a) the social policies, which cater to certain needs and expectations of the Organisation Stakeholders, and which particularly cover various issues relating to human rights, like occupational health and safety, equal opportunity, reconciliation and quality;

b) the *Personal Data Protection Policy,* which guarantees the right to the protection of data of all natural persons who establish relations with the companies belonging to PPUK, particularly ensuring respect for the rights to reputation and to privacy in the processing of the various categories of personal data;

c) the *Purchasing Policy,* which includes the PPUK's perspective on shared responsibility with its suppliers as regards respect for human rights, in order to increase the number of suppliers subject to sustainable development policies and standards based on a human rights strategy.

Apart from what is already established in these policies and in the Management System, the PPUK also explicitly makes the following commitments:

a) to reject child labour and forced or compulsory labour;

b) to respect freedom of association and collective bargaining;

c) to respect the right to freedom of movement within each country;

d) to not discriminate due to any condition;

e) to respect the rights of ethnic minorities and of indigenous peoples in the places in which it carries out its activities, and to favour an open dialogue that includes different cultural frameworks;

f) to respect the right to the environment of all of the communities in which it operates, considering their expectations and needs;

g) to understand access to energy as a right related and linked to other human rights, working with public institutions in the implementation of systems for the protection of vulnerable customers and on plans to extend service to communities that lack access to energy.

5. Relationship with Stakeholders

As to the relationship of the PPUK's Stakeholders with human rights, the following must be taken into account:

a) workforce: the professionals of the PPUK must show strict respect for the human rights recognised under domestic and international law in the conduct of their activities in all countries in which the PPUK operates, and shall particularly endeavour to ensure compliance with this *Policy* and with the PPUK's regulatory framework for human rights. All professionals of the PPUK are expected to act as a first line of defence for human rights, reporting any potential impact thereon or any breach of the PPUK's policies;

b) suppliers: must also show strict respect for the human rights recognised under domestic and international law in the conduct of their activities. The PPUK believes that its suppliers are a key ally for compliance with this *Policy* and thus assume a shared responsibility with the PPUK. In particular, suppliers and their professionals must: (i) adopt such measures as may be needed to eliminate all forms or types of forced or compulsory labour; (ii) expressly reject the use of child labour in their organisation; (iii) respect their workers' freedom of trade association and right to collective bargaining by their professionals, avoiding all discriminatory practices in connection with employment and labour; and (iv) set the salaries of their professionals in accordance with applicable law, respecting minimum salaries, overtime and social welfare benefits.

c) society in general: in its operations, the PPUK must strengthen respect for the rights of ethnic minorities and of indigenous peoples in the places in which it carries out its activities and favour access to energy;

6. Implementation and Update

The Management may draw on specialised external advice in order to conform the PPUK's operating procedures to the main principles of conduct set forth in this *Policy* and, if necessary, to monitor the *Policy* and update the text hereof.

F. O'Donoghue
General Manager
20/05/2024

Finbarr O'Donoghue

Z. Sosnowski
Quality Assurance Manager
20/05/2024