

Human Rights Policy 2024

Our commitment

Aperion Energy Group (AEG) is committed to upholding and respecting human rights in all aspects of its operations. As a global company with a diverse range of activities across multiple jurisdictions, AEG recognizes its responsibility to ensure that its business practices do not infringe on the human rights of individuals and communities. This policy outlines our commitment to human rights, sets forth the principles we adhere to, and describes the mechanisms we use to ensure compliance and continuous improvement.

Purpose: The purpose of this Human Rights Policy is to establish a clear framework for the protection and promotion of human rights within AEG's operations. This policy aims to guide our employees, contractors, suppliers, and other stakeholders in recognizing and respecting human rights in all their interactions. It is designed to integrate human rights considerations into our business strategies and decision-making processes, ensuring that we contribute positively to the communities in which we operate.

Scope: This policy applies to all employees, contractors, suppliers, and business partners of Aperion Energy Group, regardless of their location. Given AEG's role as a global company with potential exposures and operations in a wide variety of jurisdictions, this policy takes into account the varying legal, cultural, and social contexts in which we operate. It underscores our commitment to comply with local and international human rights standards and to address human rights impacts throughout our supply chain. By adhering to this policy, AEG aims to foster a culture of respect, dignity, and equality for all individuals affected by our operations.

Governance and Accountability

Board Oversight: The Board of Directors of Aperion Energy Group (AEG) holds the ultimate responsibility for overseeing the company's commitment to human rights. The Board ensures that human rights considerations are integrated into the company's overall strategy and decision-making processes. Regular reviews and reports on human rights performance are conducted to maintain transparency and accountability at the highest level.

Human Rights Committee: A dedicated Human Rights Committee is established to monitor and report on human rights issues within the company. This committee is composed of representatives from various departments, including legal, compliance, human resources, and operations. The committee is responsible for the following:

- Developing and updating the human rights policy.
- Conducting regular risk assessments and audits to identify and mitigate human rights risks.
- Reviewing and addressing human rights grievances and complaints.
- Reporting on human rights performance to the Board of Directors and senior management.

Executive Responsibility: Senior management is accountable for implementing and enforcing the human rights policy across all levels of the organization. Executives are tasked with ensuring that human rights

principles are embedded in business practices and that all employees and contractors are aware of and adhere to the policy. This includes:

- Providing the necessary resources and training to support the implementation of the policy.
- Ensuring compliance with local and international human rights laws and standards.
- Leading by example in promoting a culture of respect and accountability for human rights within the company.

Regular Monitoring and Reporting: Aperion Energy Group commits to ongoing monitoring and reporting on human rights performance. This includes:

- Conducting regular internal and external audits to assess compliance with the human rights policy.
- Reporting on human rights metrics and incidents in the company's annual sustainability report.
- Engaging with stakeholders, including employees, suppliers, and local communities, to gather feedback and improve human rights practices.

By establishing clear governance and accountability structures, Aperion Energy Group ensures that its commitment to human rights is effectively managed and continuously improved, reinforcing the company's dedication to ethical and responsible business practices.

Human Rights Principles

Non-Discrimination: Aperion Energy Group (AEG) is committed to ensuring equality and non-discrimination in all its practices. We do not tolerate discrimination based on race, color, sex, gender identity, sexual orientation, religion, national origin, age, disability, or any other status protected by applicable law. We strive to create an inclusive environment where everyone is treated with respect and dignity.

Freedom of Association and Collective Bargaining: AEG respects the right of employees to freely associate, join unions, and engage in collective bargaining. We support open and constructive dialogue with employee representatives and ensure that employees can express their concerns and negotiate working conditions without fear of retaliation.

Forced Labor and Human Trafficking: AEG strictly prohibits all forms of forced labor, including bonded labor, involuntary prison labor, and human trafficking. In alignment with our Modern Slavery Policy, we are committed to identifying and eradicating any instances of forced labor within our operations and supply chains. We conduct regular audits and risk assessments to ensure compliance with this principle.

Child Labor: AEG is committed to eliminating child labor in all its operations and supply chains. We adhere to international standards and local laws regarding the minimum age for employment. We ensure that young workers are protected from hazardous work and that their employment does not interfere with their education and development.

Working Conditions: AEG is dedicated to providing safe, healthy, and fair working conditions for all employees. We comply with occupational health and safety regulations and continuously work to improve

our practices. We ensure that working hours, breaks, and rest periods comply with applicable laws and that employees are provided with the necessary resources to perform their duties safely.

Fair Wages and Benefits: AEG provides fair compensation and benefits to all employees, in line with industry standards and local laws. We regularly review our wage and benefit structures to ensure they meet or exceed legal requirements and support the well-being of our employees and their families.

Harassment-Free Workplace: AEG is committed to maintaining a workplace free from harassment, bullying, and any form of abuse. In alignment with our Anti-Harassment Policy, we take all allegations of harassment seriously and ensure that complaints are investigated promptly and thoroughly. We promote a culture of respect and professionalism in all our interactions.

Stakeholder Engagement

Employees: Aperion Energy Group (AEG) prioritizes regular training and communication on human rights policies and practices for all employees. We ensure that our workforce is informed about their rights and responsibilities and is equipped to uphold the company's commitment to human rights. This includes mandatory training programs on human rights, ethical conduct, and how to report concerns or violations.

Suppliers and Contractors: AEG requires all suppliers and contractors to adhere to our human rights standards. We conduct thorough due diligence and regular assessments to ensure compliance throughout our supply chain. Suppliers and contractors are expected to respect human rights and implement similar policies within their own operations. We provide support and resources to help them align with our standards.

Communities: Community engagement is crucial, especially when building large power and infrastructure projects. AEG recognizes the potential impacts of its projects on local communities and is committed to engaging with them in a transparent, respectful, and inclusive manner. This includes:

- **Early Engagement:** Initiating dialogue with community members and stakeholders early in the project planning process to understand their concerns, expectations, and needs.
- **Consultation and Participation:** Involving community members in decision-making processes through public consultations, meetings, and forums. We ensure that all voices are heard, especially those of vulnerable and marginalized groups.
- **Impact Assessments:** Conducting comprehensive environmental and social impact assessments to identify potential risks and develop mitigation strategies. These assessments are shared with the community for feedback and validation.
- **Ongoing Dialogue:** Maintaining continuous communication with communities throughout the project lifecycle to address emerging issues and ensure transparency. We establish grievance mechanisms to allow community members to raise concerns and receive timely responses.
- **Benefit Sharing:** Developing initiatives that contribute to the social and economic development of local communities. This includes creating job opportunities, investing in local infrastructure, and supporting community programs in education, health, and sustainable development.

Due Diligence and Risk Management

Risk Assessment: Aperion Energy Group (AEG) regularly conducts thorough risk assessments to identify and evaluate human rights risks associated with our operations and supply chains. These assessments consider factors such as the geographical locations of our projects, the nature of our business activities, and the specific vulnerabilities of affected communities and workers. We use this information to prioritize our efforts and allocate resources effectively to mitigate identified risks.

Monitoring and Audits: AEG implements a robust monitoring and auditing process to ensure compliance with our human rights standards. This includes:

- **Internal Audits:** Regular internal audits conducted by trained personnel to evaluate adherence to the human rights policy and identify areas for improvement.
- **External Audits:** Periodic external audits by independent third parties to provide an unbiased assessment of our human rights practices. These audits include site visits, interviews with employees and stakeholders, and reviews of relevant documentation.
- **Supplier Audits:** Comprehensive audits of our suppliers and contractors to ensure they meet our human rights expectations. Non-compliant suppliers are required to implement corrective actions or face potential termination of contracts.

Reporting Mechanisms: AEG establishes clear and accessible channels for reporting human rights concerns and grievances. These mechanisms are designed to be:

- **Confidential:** Ensuring that individuals can report concerns without fear of retaliation or negative consequences.
- **Transparent:** Providing clear information on how to report concerns, the process for handling complaints, and the expected timelines for resolution.
- **Responsive:** Ensuring timely and appropriate responses to all reported concerns. We commit to investigating all complaints thoroughly and taking corrective actions where necessary.

Remediation and Corrective Actions: When human rights violations are identified, AEG is committed to taking swift and effective action to remedy the situation. This includes:

- **Investigations:** Conducting thorough investigations into reported violations to determine the root cause and identify responsible parties.
- **Remediation Plans:** Developing and implementing remediation plans to address and rectify the issues. This may involve providing compensation to affected individuals, implementing changes to prevent future violations, and supporting victims in their recovery.
- **Continuous Improvement:** Using the findings from investigations and audits to continuously improve our human rights practices. We review and update our policies, procedures, and training programs based on lessons learned and evolving best practices.

Remediation

Response to Violations: Aperion Energy Group (AEG) is committed to addressing human rights violations promptly and effectively. Upon identification of a violation, we undertake the following steps:

- **Immediate Action:** Implement immediate measures to stop the violation and prevent further harm. This may include suspending activities, isolating the affected area, or temporarily halting operations if necessary.
- **Investigation:** Conduct a thorough and impartial investigation to understand the nature, cause, and extent of the violation. This involves gathering facts, interviewing witnesses, and reviewing relevant documents and records.

Corrective Measures: Based on the investigation findings, AEG develops and implements corrective measures to remedy the violation and prevent recurrence. These measures may include:

- **Policy Revisions:** Updating or reinforcing policies and procedures to address gaps and prevent future violations.
- **Training and Education:** Providing additional training and education to employees, contractors, and suppliers to raise awareness and improve understanding of human rights issues.
- **Operational Changes:** Making necessary changes to operational practices, workflows, or management systems to enhance compliance with human rights standards.

Support for Victims: AEG is dedicated to providing support and assistance to victims of human rights abuses. This support includes:

- **Compensation:** Offering fair and appropriate compensation to victims for any harm suffered.
- **Counseling and Rehabilitation:** Providing access to counseling services, medical care, and rehabilitation programs to help victims recover and rebuild their lives.
- **Legal Assistance:** Offering legal support to victims seeking justice or reparations through legal channels.

Continuous Monitoring: After implementing corrective measures, AEG continuously monitors the situation to ensure that the violation has been fully addressed and that similar issues do not recur. This includes:

- **Follow-Up Audits:** Conducting follow-up audits and inspections to verify the effectiveness of corrective actions and ensure compliance.
- **Regular Reporting:** Keeping senior management and the Board of Directors informed about the status of remediation efforts and any ongoing risks.

Stakeholder Engagement: AEG engages with affected stakeholders, including employees, local communities, and advocacy groups, throughout the remediation process. This involves:

- **Transparency:** Communicating openly and transparently about the steps taken to address the violation and the outcomes achieved.
- **Feedback:** Seeking feedback from stakeholders to understand their perspectives and improve our remediation practices.

Training and Awareness

Employee Training: Aperion Energy Group (AEG) is committed to ensuring that all employees understand and adhere to our human rights policies and practices. To this end, we provide regular training programs that cover the following topics:

- **Human Rights Principles:** Education on fundamental human rights principles, including non-discrimination, freedom of association, and the prohibition of forced and child labor.
- **Company Policies:** Detailed information about AEG’s Human Rights Policy, Modern Slavery Policy, and Anti-Harassment Policy, including procedures for reporting concerns and violations.
- **Role-Specific Training:** Customized training for different roles within the company to address specific human rights risks and responsibilities. For example, training for procurement staff on conducting due diligence with suppliers or training for site managers on maintaining safe and fair working conditions.

Awareness Campaigns: AEG conducts ongoing awareness campaigns to reinforce the importance of human rights and promote a culture of respect and accountability. These campaigns include:

- **Communication Materials:** Distribution of brochures, posters, and online resources that highlight key human rights issues and AEG’s commitment to addressing them.
- **Events and Workshops:** Organizing events, workshops, and seminars featuring experts in human rights to provide deeper insights and foster dialogue among employees and stakeholders.
- **Internal Communications:** Regular updates through internal newsletters, intranet, and other communication channels to keep employees informed about human rights initiatives, success stories, and areas for improvement.

Supplier and Contractor Training: AEG extends its training and awareness efforts to suppliers and contractors to ensure they align with our human rights standards. This includes:

- **Onboarding Programs:** Integrating human rights training into the onboarding process for new suppliers and contractors.
- **Workshops and Seminars:** Offering workshops and seminars to educate suppliers and contractors about our human rights expectations and best practices.
- **Collaboration and Support:** Providing resources and support to help suppliers and contractors develop and implement their own human rights policies and practices.

Community Awareness: AEG engages with local communities to raise awareness about human rights and the company’s efforts to uphold them. This involves:

- **Community Meetings:** Hosting regular meetings with community members to discuss human rights concerns, share information about AEG’s policies, and seek feedback.
- **Educational Programs:** Partnering with local organizations to deliver educational programs on human rights, particularly in areas affected by our operations.

Evaluation and Improvement: AEG continually evaluates the effectiveness of its training and awareness programs through:

- **Feedback Mechanisms:** Collecting feedback from employees, suppliers, contractors, and community members to identify strengths and areas for improvement.
- **Performance Metrics:** Monitoring key performance indicators related to human rights training and awareness, such as participation rates and the number of reported concerns.
- **Program Updates:** Regularly updating training materials and awareness campaigns based on feedback, emerging human rights issues, and evolving best practices.

Reporting

Public Reporting: Aperion Energy Group (AEG) is committed to transparency in its human rights practices and performance. We publish reports, as required by our projects and exposures, that detail our efforts and progress in upholding human rights. These reports include:

- **Annual Sustainability Report (2024 pending):** A comprehensive overview of our sustainability initiatives, including a dedicated section on human rights. This report covers our policies, risk assessments, mitigation strategies, and performance metrics related to human rights.
- **Human Rights Impact Assessments:** Detailed reports on the findings of our human rights impact assessments, including identified risks, mitigation measures, and outcomes. These assessments are conducted periodically and shared with stakeholders to demonstrate our commitment to addressing human rights impacts.
- **Case Studies and Success Stories:** Highlighting specific examples of how AEG has successfully addressed human rights challenges and contributed positively to the communities in which we operate.

Internal Reporting: AEG ensures that human rights issues are regularly reported to senior management and the Board of Directors. This includes:

- **Quarterly Reports:** Regular updates to senior management on human rights performance, including key metrics, audit findings, and any reported violations or grievances.
- **Board Reports:** Detailed reports to the Board of Directors on significant human rights issues, trends, and strategic initiatives. These reports facilitate informed decision-making and ensure that human rights considerations are integrated into the company's overall strategy.
- **Incident Reports:** Immediate reporting of any significant human rights incidents to senior management and the Board of Directors. These reports include a description of the incident, the response measures taken, and any lessons learned.

Stakeholder Communication: AEG maintains open and transparent communication channels with all stakeholders to ensure they are informed about our human rights practices and performance. This includes:

- **Website and Social Media:** Regularly updating our website and social media platforms with information about our human rights initiatives, reports, and case studies.
- **Stakeholder Meetings:** Hosting regular meetings with employees, suppliers, contractors, and community members to discuss human rights issues, share progress, and gather feedback.
- **Newsletters and Bulletins:** Distributing newsletters and bulletins to stakeholders to keep them informed about our human rights efforts and any relevant developments.

Feedback and Grievance Mechanisms: AEG provides clear and accessible mechanisms for stakeholders to provide feedback and report human rights concerns. This includes:

- **Hotline and Email:** Establishing a dedicated hotline and email address for reporting human rights grievances. These channels are available to all employees, suppliers, contractors, and community members.
- **Anonymous Reporting:** Offering anonymous reporting options to ensure that individuals can report concerns without fear of retaliation.
- **Response and Follow-Up:** Committing to timely and thorough responses to all reported grievances. We ensure that each report is investigated, and appropriate actions are taken. Stakeholders are kept informed about the status and outcomes of their reports.

Continuous Improvement

Policy Review: Aperion Energy Group (AEG) is dedicated to the continuous improvement of its human rights practices. We regularly review and update our Human Rights Policy to reflect evolving standards, best practices, and feedback from stakeholders. This ensures that our policy remains relevant and effective in addressing human rights issues. The review process includes:

- **Annual Review:** Conducting an annual review of the Human Rights Policy to assess its effectiveness and identify areas for improvement.
- **Stakeholder Feedback:** Incorporating feedback from employees, suppliers, contractors, community members, and other stakeholders into policy updates.
- **Regulatory Changes:** Monitoring changes in local and international human rights laws and standards to ensure compliance and update our policy accordingly.

Feedback Mechanisms: AEG values the input of its stakeholders and encourages continuous feedback to enhance our human rights practices. This includes:

- **Surveys and Questionnaires:** Conducting regular surveys and questionnaires to gather feedback from employees, suppliers, contractors, and community members about our human rights practices.
- **Focus Groups:** Organizing focus groups with stakeholders to discuss human rights issues and gather insights on potential improvements.
- **Suggestion Programs:** Implementing suggestion programs that allow stakeholders to submit ideas and recommendations for improving human rights practices.

Benchmarking and Best Practices: AEG is committed to staying informed about industry trends and best practices in human rights. This involves:

- **Industry Benchmarking:** Regularly benchmarking our human rights performance against industry peers and leaders to identify areas for improvement and innovation.
- **Best Practice Adoption:** Actively seeking out and adopting best practices from other organizations and industries to enhance our human rights practices.

- **Collaboration and Partnerships:** Engaging with industry associations, NGOs, and other organizations to share knowledge, collaborate on human rights initiatives, and promote best practices.

Innovation and Technology: AEG leverages innovation and technology to improve its human rights practices. This includes:

- **Data Analytics:** Utilizing data analytics to monitor and assess human rights risks, track performance, and identify trends.
- **Technology Solutions:** Implementing technology solutions to enhance transparency, streamline reporting, and improve the efficiency of human rights audits and assessments.
- **Research and Development:** Investing in research and development to explore new approaches and technologies for protecting and promoting human rights.

Related Policies

Aperion Energy Group (AEG) recognizes the importance of aligning its Human Rights Policy with other existing policies to create a cohesive and comprehensive framework for ethical business conduct. This section outlines the key policies that support and enhance our commitment to human rights.

Modern Slavery Policy: AEG is firmly committed to combating modern slavery and human trafficking in all its forms. Our Modern Slavery Policy outlines our zero-tolerance approach to forced labor, bonded labor, involuntary prison labor, and human trafficking. This policy includes:

- **Risk Assessments:** Conducting regular risk assessments to identify and address modern slavery risks within our operations and supply chains.
- **Supplier Requirements:** Requiring all suppliers to comply with our Modern Slavery Policy and conducting due diligence to ensure adherence.
- **Training and Awareness:** Providing training for employees and suppliers on modern slavery risks and reporting mechanisms.
- **Reporting and Remediation:** Establishing clear reporting mechanisms for modern slavery concerns and taking swift action to remediate any identified issues.

Anti-Harassment Policy: AEG is committed to maintaining a workplace free from harassment, bullying, and any form of abuse. Our Anti-Harassment Policy ensures a respectful and safe work environment for all employees. Key elements include:

- **Definitions and Examples:** Providing clear definitions and examples of harassment, including sexual harassment, verbal abuse, and discriminatory behavior.
- **Reporting Procedures:** Outlining procedures for reporting harassment, including confidential channels and protection against retaliation.
- **Investigation and Resolution:** Committing to prompt and thorough investigations of harassment complaints and taking appropriate disciplinary action when necessary.

- **Support for Victims:** Offering support services for victims of harassment, including counseling and legal assistance.

Code of Conduct: AEG's Code of Conduct establishes the ethical standards and expectations for all employees, contractors, and business partners. It includes:

- **Ethical Behavior:** Promoting integrity, honesty, and ethical behavior in all business dealings.
- **Compliance with Laws:** Ensuring compliance with all applicable laws and regulations, including those related to human rights.
- **Respect and Dignity:** Fostering a culture of respect and dignity for all individuals, both within the company and in our interactions with external stakeholders.

Health and Safety Policy: AEG is dedicated to providing a safe and healthy work environment for all employees. Our Health and Safety Policy includes:

- **Risk Management:** Identifying and mitigating health and safety risks in the workplace.
- **Training and Resources:** Providing necessary training and resources to ensure safe working practices.
- **Incident Reporting:** Establishing procedures for reporting and investigating health and safety incidents.



Reporting

We encourage our employees, suppliers and stakeholders to speak up, without retribution, about any concerns regarding human rights in our operations or supply chain. Please report any suspected violations of this policy and any law to Henry Gomez, CFO, Compliance at hgomez@aeprime.com

Sincerely,

Aaron Wheeler
Chief Executive Officer

Last Update / Review: July 2024