

POLICY Human Rights



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Subject to change. This policy may be amended or replaced at any time.



Owner

Department: Legal
Position: General Counsel



Applies to

Unless otherwise indicated, this policy applies to all staff, officers, directors, consultants, contractors, part or fixed-term employees, casual and agency staff and volunteers (collectively referred to as “staff” in this document. They do not form part of the terms of your contract.



Jurisdictional Coverage

All

Mandatory

Breaches of this policy may result in disciplinary action, up to and including dismissal. Please refer to the disciplinary policy.

HUMAN RIGHTS POLICY

Purpose

Genel is committed to providing a working environment that treats all people with dignity and respect. Genel expects to be held to high standards in what we do. We strive to be a safety leader in our industry, a world-class independent E&P creator of shareholder value, a good corporate citizen and a great employer. Genel cares about the impact of its decisions, large and small, on those around us. This includes impacts on human rights.

Commitment

Genel aims to conduct its business in a manner that respects the rights and dignity of all people, complying with all legal requirements.

We respect internationally recognised human rights, as set out in the International Bill of Human Rights, the International Labour Organization's declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and UN Guiding Principles on Business and Human Rights. We focus our efforts through key areas which includes but is not limited to:

- freedom from slavery, forced or compulsory labour
- freedom of opinion
- freedom of association and the effective recognition of the right to collective bargaining
- eradication of child labour
- elimination of discrimination in the workplace where possible by providing a just and favourable condition of work and remuneration, including equal pay
- taking a precautionary approach to environmental challenges

We aim to treat everyone who works for Genel fairly and without discrimination. Genel aims for all staff to be adequately remunerated and for there be no forced or child labour. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.

We respect the rights of people in communities impacted by our activities. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them. We are also committed to paying special attention to the rights of potentially vulnerable groups.

We will seek to make contractual commitments with suppliers that encourage them to adhere to the same principles contained in this policy statement.

We aim to keep our staff and facilities safe by assessing the security threats and risks to our operations. We work with host countries and governments to safeguard our assets and provide a secure working environment. We use armed security in specific countries of our operations where the security threat level dictates or is required by law in the jurisdiction. We understand our duty of care extends to the communities impacted by our operations.

We aim to identify and review the key environmental issues for Genel, assess the environmental impact of our operations and seek to improve environmental performance.

Consistent with the Code of Conduct, Genel expects all staff to meet their commitment to respect human rights and to speak up and report concerns.

Delivery

Genel will meet its responsibility to respect human rights by implementing the relevant sections of the UN Guiding Principles on Business and Human Rights and incorporating them into the processes and policies that govern all our business activities.

We will work to embed human rights into environmental, social and health impact assessments as appropriate. In assessing and addressing the impacts of our operations and relationships, we will consult with those who may

be affected, including indigenous people, where this is possible and appropriate, while meeting applicable legal requirements. We will make an effort to ensure we engage with those most vulnerable, in particular where they encounter challenges in voicing their opinions or having them heard, and to identify any additional specific measures to avoid, prevent or mitigate impacts on them.

Where Genel identifies that we have caused or directly contributed to adverse impacts on the human rights of others, Genel shall provide for or cooperate in the remediation of the adverse impacts through legitimate processes.

We will make sure that our communications with governments, regulatory bodies and public authorities are consistent with our human rights commitments, as stated in this policy.

In these instances where there is a legal requirement and this Policy, we shall seek to apply the most stringent standard, as stipulated in the UN Guiding Principles on Businesses and Human Rights, without violating domestic law.

If complaints made by our workforce or any other third party cannot be handled informally or are sufficiently serious, they should be raised via either Genel's grievance policy or whistleblowing policy.

Governance

The Board of Directors have overall responsibility for ensuring this policy complies with Genel's legal and ethical obligations, and that all those under Genel's control or with whom it engages, comply with it. Any violation or suspected violation of this policy should be reported as soon as practicable. Genel shall report annually to the Board and Audit committee on any material violation of this policy.

Genel shall record and report internally all legitimate adverse human rights impacts, in line with this policy.

