

Our commitment to human rights is applicable to all our employees and contractors. It is embedded into our existing framework and process, such as our SEEPCO General Business Principles and our Code of Conduct, as well as our Health, Safety, Environment and Fire. The SEEPCO Supplier Principles include specific labour and human rights expectations for contractors and suppliers.

Our vision

We are determined to grow as a social enterprise proud of its sustainable businesses that are socially relevant and responsible by contributing to its corporate role in national development, respect for communities, and creating value for all stakeholders.

SEEPCO supports the following voluntary codes:

- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact 10 Principles
- Joint Industry Human Rights Supply Chain Engagement
- International Finance Corporation's Environmental and Social Performance Standards
- Building Responsibly Principles
- United Nations Standards of Conduct for Business
- Voluntary Principles on Security and Human Rights (VPSHR)

SEEPCO is committed to respecting human rights as set out in the:

- United Nations Universal Declaration of Human Rights
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work

How we work

We have an integrated approach to human rights that is informed by the UN Guiding Principles. This is embedded into our policies, enterprise risk management frameworks and processes. Human rights due diligence is embedded into our ways of working – which are applicable to all employees and contractors.

Our management framework

Human rights are embedded into the SEEPCO General Business Principles. Our SEEPCO Code of Conduct has been designed to help every one of us make the right decisions and remain true to our core values and Business Principles. The SEEPCO Supplier Principles include specific labour and human rights expectations for contractors and suppliers.

All SEEPCO employees, contractors, and those working in joint ventures that we operate are expected to understand and work in line with the SGBPs. We encourage suppliers and our partners in joint ventures that we do not operate to apply equivalent principles.

The SEEPCO Code of Conduct explains how employees, contractors, and anyone else acting on behalf of SEEPCO must behave to live up to our business principles. SEEPCO provides mandatory training and regularly reminds employees and contractors about the importance of both the SGBPs and the Code of Conduct. We also expect SEEPCO's contractors and suppliers to understand and meet our robust requirements.

We provide Human Rights awareness training, which is available to all staff and mandated for selected staff working in higher-risk focus areas, for example, in Contracting and Procurement (C&P), Human Resources (HR) or in new business development.

Governance

How are Human Rights governed at SEEPCO?

- SEEPCO has a cross-functional Human Rights Working Group (HRWG) to advise and support the implementation of our approach to human rights. This group has representatives from all our focus areas and various experts from across the organisation and includes Business for Social Responsibility (BSR) as an external advisor. Throughout the year the working group discusses key developments, potential risks and improvement opportunities.
- A steering committee composed of senior executives, chaired by the Chief of Staff and Corporate Relations, supports the work of the Human Rights Working Group.
- A board committee that assists the Board of Directors of SEEPCO – reviews the progress of the SEEPCO Group of Companies with respect to sustainability and the non-financial

elements of the Company's Powering Progress strategy. The Committee meets regularly to review and discuss a wide range of topics, including progress on SEEPCO's Powering Progress goals of net-zero emissions, respecting nature, and powering lives. The overall accountability for sustainability within SEEPCO lies with the Chief Executive Officer and the Executive Committee.

Our commitments

We focus our effort on four key areas where human rights are critical to the way we operate and where we have identified the risks are highest for potential impact on human rights: labour rights, communities, workers in our supply chain and security. In these areas we have made the following commitments.

Our workforce

We respect our 'employees' and 'contractors' rights by working in line with the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the UN Global Compact. We respect the principles of freedom of association, the right to collective bargaining, non-discrimination, and equal opportunity, along with adequate work conditions, adequate remuneration, the elimination of forced and child labour and a safe and healthy working environment.

Modern slavery

SEEPCO is opposed to all forms of modern slavery. We set clear expectations for contractors and suppliers not to use forced, prison or compulsory labour and no payment of recruitment fees by workers. We expect contractors and suppliers to respect freedom of association and collective bargaining; to provide a safe, secure, and healthy workplace, and to provide wages and benefits that meet or exceed the national legal standards. Our contractors and suppliers should provide workers with whistleblowing mechanisms where grievances related to the above topics can be logged confidentially.

Communities

We manage the social impacts, including potential human rights impacts, of our business activities carefully, working to enhance the benefits to local communities and to mitigate negative impacts. Listening and responding to community concerns is an important part of our approach to providing access to remedy.

Security

SEEPCO strives to keep staff and facilities safe while respecting the human rights and security of local communities. We carefully assess security threats and risks to our operations and work with governments and partners to mitigate negative consequences. SEEPCO avoids the use of armed security except for where there is a requirement under local laws or where the threats are most severe.

Indigenous people – FPIC

Our activities in certain parts of the world affect Indigenous people who hold specific rights for the protection of their cultures, traditional ways of life and special connections to lands and waters. In line with SEEPCO's General Business Principles and in support of the UN Declaration on the Rights of Indigenous People (UNDRIP), our approach is to continue seeking the support and agreement of Indigenous people potentially affected by our projects through mutually agreed, transparent and culturally appropriate consultation and impact management processes. It entails open dialogue, good faith negotiations, and, where appropriate, the development of agreements that address the needs of Indigenous People.

Equality and non-discrimination

As stated in our Code of Conduct, at SEEPCO, we offer equal opportunities to everyone. Our human resources policies and standards help us establish fair labour practices and a positive work environment. To achieve this, we must ensure all people are treated fairly, irrespective of their race, gender, ethnicity, age, physical ability, religion, sexual orientation, or other status.

Worker welfare

Care for our workers reflects our core values and our approach to safety. We also know that when people feel cared for, they perform at their best. Our ambition is to respect and promote the rights and welfare of our employees and contractors. SEPCO supports the Building Responsibly Principles. They are incorporated into our management system we have started implementing these across our operations.

Land acquisition and resettlement

We occasionally require temporary or permanent access to areas of land or sea where people are living and/or working. Where resettlement is unavoidable, we work with local communities to help them resettle and maintain, or improve, their standard of living in accordance with international standards for resettlement. Resettlement planning starts at the earliest stages of a project. In cases where there is only economic displacement, we support impacted people to establish alternative livelihoods.