STERLING & WILSON

Human Rights Policy



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Human Rights Policy

At Sterling & Wilson Renewable Energy (SWREL), we are deeply committed to upholding and promoting human rights across all aspects of our operations. Our dedication to respecting the dignity and individuality of our employees, vendors, suppliers, communities, and stakeholders is at the core of our business practices. This policy is informed by international frameworks, including the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and other relevant global covenants. SWREL periodically identifies, assesses and manages actual and potential human rights risks across its operations and value chain. Human rights impacts are evaluated during business operations, project execution and supplier engagement, with corrective actions implemented where necessary.

Policy Objectives:

- **Safeguard Human Rights:** Ensure that our operations and value chain are free from human rights violations, in full compliance with the standards set forth in this policy.
- **Promote Equality:** Uphold the dignity of all individuals, irrespective of gender, race, colour, nationality, religion, physical or mental disability, medical condition, sexual orientation, or marital status.
- **Foster Diversity and Inclusion:** Create a workplace where diversity is celebrated, and all employees are empowered to contribute fully without fear of discrimination.
- **Ensure Workplace Safety:** Provide a work environment that is safe, harmonious, and respectful, where the rights of employees and stakeholders are protected.
- **Support Employee Well-Being:** Recognize that the well-being of our employees is fundamental to their productivity and job satisfaction. We commit to providing resources and support for physical, mental, and emotional well-being.
- **Address Human Rights Impacts:** Proactively avoid infringing on the human rights of others and address any adverse impacts that may arise.
- **Implement Robust Processes:** Establish comprehensive procedures for addressing any human rights issues that may emerge within our operations or among our stakeholders.

Scope and Applicability

- **Equal Employment Opportunity and Diversity:** We are dedicated to fostering a workplace free from discrimination and prejudice, where every individual is valued for their unique contributions. Employment decisions are made based on merit, without consideration of gender, race, color, nationality, religion, disability, or any other protected characteristic.

- **Fair Compensation:** SWREL is committed to providing fair wages, benefits, and employment conditions that respect the rights and dignity of all employees.
- **Freedom of Expression:** We respect the rights of our employees to express their opinions and ensure safe and humane working conditions that uphold their well-being.

Employee Well-Being:

- **Physical Well-Being:** SWREL is committed to ensuring a healthy work-life balance and provides access to health and fitness programs, ergonomic workspaces, and regular health check-ups to support physical well-being.
- **Mental and Emotional Well-Being:** We recognize the importance of mental health and offer resources such as counselling services, stress management programs, and mental health awareness training. We strive to create a supportive environment where employees feel comfortable discussing mental health concerns.
- **Work-Life Balance:** We encourage flexible working arrangements, where possible, to help employees balance their professional and personal responsibilities effectively.
- **Living Wage**: SWREL is committed to providing wages and benefits that meet or exceed applicable legal minimum wage requirements and progressively supports the implementation of fair and living wages that enable employees to maintain a decent standard of living. Wage practices are periodically reviewed to ensure fairness, equity, and compliance with applicable laws.
- **Working Hours:** SWREL complies with all applicable labour laws governing working hours, rest periods, weekly holidays and leave entitlements. Overtime is voluntary, compensated in accordance with legal requirements, and monitored to prevent excessive working hours.

Harassment-Free Workplace:

- **Zero Tolerance for Harassment:** SWREL maintains a strict policy against harassment of any kind, whether physical, verbal, or psychological. We are committed to providing a work environment that is free from behaviours that demean, intimidate, or harm individuals based on race, religion, gender, sexual orientation, or any other characteristic.
- **Sexual Harassment:** We take incidents of sexual harassment seriously and encourage employees to report any such incidents to the Internal Complaints Committee, in accordance with our Prevention of Sexual Harassment (POSH) Policy.
- **Preventive Measures:** Our policies are designed to prevent harassment and address it promptly and effectively should it occur.

- **Freedom of Association:** SWREL respects employees' rights to freely associate, join or not join trade unions or employee representative bodies, and engage in collective bargaining in accordance with applicable laws without fear of discrimination, intimidation or retaliation.

- **Consultation Channels and Worker Representative Engagement**

  SWREL is committed to maintaining an open, transparent and constructive dialogue with employees and their representatives. The Company respects the right of employees to participate in consultation processes and engage through recognized worker representative bodies, employee committees or other lawful consultation mechanisms, in accordance with applicable laws and regulations. SWREL encourages regular communication and consultation on matters relating to workplace health and safety, employee well-being, human rights, working conditions and other employment-related matters

- **Worker Engagement**

  The Company values employee participation in decision-making processes that affect the workplace and is committed to fostering a culture of mutual trust, collaboration and continuous improvement through constructive engagement with employees and their representatives. Employees are provided with appropriate channels to express concerns, share feedback and contribute suggestions without fear of discrimination, intimidation or retaliation.

  Human Rights Impacts on External Stakeholders

  SWREL is committed to identifying, preventing, mitigating and addressing actual and potential adverse human rights impacts that may arise from its business activities, projects and value chain on external stakeholders, including local and affected communities, land users, neighbouring populations, suppliers, contractors and other relevant stakeholders. Where applicable to its project activities, SWREL will consider potential impacts relating to community health and safety, access to land and natural resources, livelihoods, displacement, cultural heritage and the rights of indigenous or vulnerable communities, in accordance with applicable laws and internationally recognized human rights principles.

  SWREL will undertake appropriate human rights due diligence, stakeholder consultation and risk assessment processes based on the nature, scale and location of its operations. Where actual or potential adverse impacts are identified, SWREL will take appropriate measures to prevent, mitigate and remediate such impacts, including corrective actions and engagement with affected stakeholders. Accessible grievance and feedback mechanisms will be maintained to enable external stakeholders to raise human rights concerns without fear of retaliation. The effectiveness of these measures

will be periodically reviewed through human rights risk assessments, project-level assessments, stakeholder engagement, supplier ESG assessments, grievance monitoring and management review.

Prohibition of Modern Slavery, Child and Forced Labor:

- **Child Labor:** SWREL strictly prohibits the employment of children below the minimum legal age for employment. We do not engage in or support child labor, and children under the age of 18 are not employed in any capacity.
- **Forced Labor:** We reject all forms of forced labor. Employees are free to leave their employment after giving reasonable notice, as required by law or contract.
- **Modern Slavery and Human Trafficking:** SWREL maintains zero tolerance towards modern slavery, debt bondage, human trafficking and all forms of involuntary labour. Identity documents are never retained, recruitment fees are not charged to employees, and all employment is based on free and informed consent.

Health and Safety:

- **Commitment to Safety:** We recognize our employees as valuable assets and are committed to providing a safe and healthy working environment. This includes access to clean water, proper sanitation, adequate ventilation, emergency exits, and first aid provisions.
- **Compliance and Responsibility:** All employees are expected to adhere to the company's safety procedures and relevant legal requirements. We also expect our contractors and partners to meet the same high standards of health and safety protection.
- **Substance-Free Workplace:** SWREL prohibits the use, possession, or distribution of illegal drugs or alcohol on company premises and expects employees to maintain sobriety during work hours.

Implementation and Monitoring:

- **Non-Retaliation:** SWREL prohibits retaliation against any individual who raises concerns or reports suspected human rights violations in good faith. All complaints are investigated fairly, confidentially and impartially.
- **Protection of Vulnerable Groups:** SWREL is committed to protecting the rights of women, migrant workers, contract workers, apprentices, persons with disabilities and other vulnerable groups by ensuring equal opportunity, dignity, fair treatment and a safe working environment.

- **Roles and Responsibilities:** The implementation of this policy is overseen by the Board of Directors and senior management, ensuring alignment with SWREL's ethical standards and international norms.
- **Training and Awareness:** Regular training programs will be conducted to raise awareness of human rights and employee well-being issues, ensuring that employees understand their rights and responsibilities.

SWREL monitors the effectiveness of this policy through:

- Human Rights training completion
- Human Rights risk assessments
- Supplier ESG assessments
- Internal audits
- Grievance monitoring
- Corrective Action Plans
- Periodic Management Review
- ESG Committee Review

Conclusion: Sterling & Wilson Renewable Energy is committed to fostering a culture of respect, dignity, and inclusiveness. Through this policy, we aim to create a positive impact on our employees, stakeholders, and the communities in which we operate, ensuring that human rights and well-being are at the forefront of our business practices.

Approved On:	**Approved By:**
31.05.2025	SWREL Management

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