

Human Rights & Working-Conditions Policy

Document control

Owner: Compliance

Board sponsor: Managing Director

Approved by: Dragomir Ivanov, CEO

Approval date: 10.03.2025

Version: 1.0

Next review: 10.03.2026

Message from the CEO

Respect for people is fundamental to HYDROGENERA's success. We are committed to safe, fair and dignified work across our operations and supply chain. This Policy sets clear standards on human rights and working conditions and explains how concerns can be raised and addressed without fear of retaliation.

I expect every manager and supplier to uphold these commitments and to act swiftly where gaps are identified.

Dragomir Ivanov
CEO

1) Policy statement

HYDROGENERA is committed to respecting internationally recognised human rights, including the Universal Declaration of Human Rights, the ILO Core Conventions and the UN Guiding Principles on Business and Human Rights. We prevent, mitigate and remedy adverse impacts connected to our operations, products and supply chain.

2) Scope & responsibilities

- The Board oversees this Policy. Management implements it through risk-based due diligence, controls and training.
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- This Policy applies to employees, temporary workers and contractors; we expect suppliers to adopt equivalent standards.

3) Minimum labor standards

a) Prohibition of child labor & young workers

- No recruitment of anyone under the legal minimum working age.
- No hazardous or night work for anyone under 18.
- Robust age-verification procedures during hiring.

b) Prohibition of forced, bonded or compulsory labor

- No coercion, debt bondage, retention of identity documents or recruitment fees.
- Workers may leave employment with reasonable notice.

c) Freedom of association & collective bargaining

- Respect workers' rights to form, join or not join trade unions and to bargain collectively, consistent with law.
- Where legally restricted, facilitate alternative worker representation.

d) Non-discrimination, equality & dignity

- No discrimination or harassment based on protected characteristics (e.g. sex, gender, race, ethnicity, nationality, religion, disability, age, sexual orientation, gender identity, pregnancy, political opinion).
- Employment decisions are based on merit.

e) Fair wages & benefits

- Pay at least the legal minimum or collectively agreed rates, whichever is higher.
- Provide all legally mandated benefits.
- Pay on time with transparent payslips; prohibit unlawful deductions.

f) Working hours

- Comply with legal limits on regular and overtime hours.
- Provide at least one day off in seven.
- Overtime must be voluntary, recorded and compensated at premium rates.

g) Health, safety & well-being

- Provide a safe and healthy workplace, regular risk assessments, training, suitable Personal Protective Equipment and emergency preparedness.
- Investigate incidents, implement corrective actions and promote mental well-being.
- Have installed fire protection & prevention systems: smoke alarms, fire extinguishers & sprinklers, fire exit signs & lightning

h) Grievance mechanisms & remediation

- Provide accessible, confidential channels for employees and other stakeholders to raise concerns without fear of retaliation.
- Commit to timely, fair investigation and remedy.

4) Additional commitments

- **Migrant and agency workers:** Equal protection and no recruitment fees; contracts in a language understood; unrestricted access to passports and personal documents.
- **Privacy:** Respect personal data and keep employment records secure.
- **Community & land rights:** Avoid adverse impacts on local communities; obtain free, prior and informed consent where relevant.
- **Environment & resource efficiency:** Implement our formal Environment Policy, which sets measurable targets for energy efficiency, increasing renewable-energy use, sustainable resource management and waste reduction, recognising the nexus between environment and human rights.
- **Business ethics & integrity:** Maintain and enforce a Business Ethics framework that incorporates our Anti-Corruption & Anti-Money-Laundering Policy and Conflict of Interest Policy. Bribery, facilitation payments and money-laundering are strictly prohibited; actual or potential conflicts of interest must be disclosed and properly managed.

5) Due diligence in our operations & supply chain

- **Risk assessment:** Periodic human-rights risk mapping covering our sites, products and higher-risk suppliers/locations.
- **Integrate & act:** Embed requirements in purchasing, onboarding and contracts; use improvement plans where gaps are found.
- **Track & report:** Monitor performance with KPIs (e.g. training completion, incidents, audit-closure rates) and report progress in our sustainability communications.
- **Engage stakeholders:** Consult employees, worker representatives, local communities and expert organizations where appropriate.

6) Training & awareness

Provide targeted training for managers, HR, procurement and higher-risk functions; include this Policy in onboarding for all staff.

7) Implementation tools

- Supplier Code / contractual clauses mirroring this Policy.
- Screening and due diligence for new suppliers and mergers.
- Audit or assessment for higher-risk suppliers.
- Corrective-action plans with realistic timelines.

8) Governance, review & updates

The Owner reviews this Policy at least annually and whenever there are significant operational or legal changes.

Questions and reports: compliance@hydrogenera.eu

Approved by: Dragomir Ivanov, CEO

Date: 10.03.2025

Signature:

