

NHOA

New horizons ahead.

HUMAN RIGHTS POLICY

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1. INTRODUCTION

This Human Rights Policy represents a practical tool to help each of NHOA Group's ("NHOA" or the "Group") managers to incorporate this approach into their activities, and those of their members of staff, outlining the international requirements for businesses and the ethical commitments and principles of the Group.

The purpose of this 231 Procedure is to be a sort of operational guide that incorporates human rights into the overall framework for the Group's management, in NHOA's processes for ethical compliance and in the analysis of the risks and impacts of its activities.

NHOA adheres to the highest standards on the protection of human rights, and, among others to the United Nations Guiding Principles on Businesses and Human Rights. The European Commission, in its last communication on Corporate Social Responsibility, "expects all European enterprises to meet the corporate responsibility to respect human rights, as defined in the UN Guiding Principles". At the government's request, the French "Commission Nationale Consultative des droits de l'Homme" issued an opinion on the future French national action plan and recommends, in particular, "a legal obligation of due diligence in the field of human rights on companies with regard to both their own actions and those of their subsidiaries and commercial partners, both in France and abroad".

Human rights are part of the four core values of NHOA, as defined in its Code of Ethics, which is part of the Organization, Management and Control Model of NHOA. In particular, the value of "Respect Others" means the respect for the rights of individuals, for their dignity in all circumstances and for their differences, as well as the respect for cultures.

This 231 Procedure is primarily intended for managers who will need to acquaint themselves with the content and ensure that the conditions for its implementation are fulfilled.



This 231 Procedure contains relevant control measures for compliance with the legal provisions on the Company's administrative liability (including the Italian Legislative Decree relating to the Organizational Model adopted by the Company).



This 231 Procedure contains information flow to be provided to the Supervisory Body.

NHOA fully adheres to the UN Principles and therefore commits to:

- **act with due diligence**, to identify, prevent and mitigate the adverse impacts of its activities;
- **remedy any adverse impacts** on human rights when it establishes that its activities have had such effects.

Moreover, the purpose of this 231 Procedure is to:

- combat illegal intermediation and labor exploitation;
- combat the employment of irregular workers and human beings trafficking.

These objectives are met by instituting appropriate system for the recruitment of strangers and for the recruitment of suppliers or third commercial parties, with whom NHOA entertains commercial relationships, that employee foreigner workers.



Such compliance is ensured by investigating about the correct recruitment stages.

The Supervisory Body may at any time demand proof of the respect of recruiting process.

Noncompliance with the principles of this 231 Procedure can lead to heavy criminal penalties for individuals and legal entities (heavy fines/interdictive penalties and/or imprisonment).

2. DEFINITION AND IDENTIFICATION

- **231PROCEDURE**: specific procedure which contains the operating procedures and the subjects involved in the Processes at Risk.
- **BUSINESSFUNCTION**: function responsible for performing specific activities or actions related to one or more Processes at Risk.
- **CODE OF ETHICS**: document with the ethical principles that guide the company in the performances of its activities.
- **EMPLOYEES**: individuals who have an employment relation with the Company.
- **ITALIAN LEGISLATIVE DECREE**: Italian Legislative Decree of June 8, 2001, n. 231, entitled "Discipline of administrative liability of legal persons, companies and associations even without legal personality, pursuant to art. 11 of the Law of September 29, 2000, n. 300", published in the Official Gazette n. 140 of June 19, 2001, as well as the subsequent amendments and additions, including Law 146/2006, which refers to its application in art. 10.
- **NHOA GROUP**: group headed by NHOA S.A., a company incorporated under French law with registered office in Paris, rue de Londres 28, 75009, registered in the Paris companies register under number 808 631 691, VAT and Tax Code FR66808631691, listed on the Euronext market.
- **ORGANIZATIONAL MODEL**: Organizational and Management Model adopted by the Company pursuant to Articles 6 and 7 of the Italian Legislative Decree, as an organic set of principles, rules, regulations, organizational schemes and related duties and responsibilities, in order to prevent the offenses referred to in the same Italian Legislative Decree. The Organizational Model includes, in particular, the General Part, the Special Parts and the 231 Procedures.
- **PROCESSES AT RISK**: corporate processes or phases thereof, the development of which could lead to unlawful acts (crimes or misdemeanors) referred to in the Italian Legislative Decree.
- **SUPERVISORY BODY**: the body of the Company appointed pursuant to art. 6 of the Italian Legislative Decree, which has the task of monitoring the functioning of and compliance with the Organizational Model and updating it.

3. NHOA'S COMMITMENTS

3.1 Doing business respecting human rights

The Group carries out its activities while respecting internationally recognized human rights, wherever it operates. It makes sure that its business activities are conducted in accordance with the highest standards of protection and, at a minimum, in line with the provisions of international texts for the protection and defense of human rights.

In the event of conflicting standards between domestic law and international standards, the Group strives to find alternative means to comply with international principles, without violating domestic laws.

It is particularly vigilant when operating in 'high risk' countries (such as conflict zones or countries with weak governance).

3.2 Rights of employees

The Group makes sure that the fundamental rights of its employees are respected, in accordance with the conventions of the International Labour Organization:

- it rejects all forms of forced or compulsory labour
- it rejects all forms of child labour
- it rejects all forms of discrimination
- it recognizes freedom of association and the right to collective bargaining
- it guarantees the highest standards of health and safety in the workplace (including accommodations if provided)
- it guarantees working hours and holidays, wages and benefits in accordance with international standards.



NHOA undertakes to respects the human rights of the workers and to respects the employment contract conditions (such as the work-life balance, the salary, the working hours, holidays etc).

The recruitment of workers and stranger workers must be transparent and must foresee an adequate system of Power of Attorneys and separation of powers.

NHOA strictly monitors every event relating to residence permits.

3.3 Workplace's safety

The Group rejects all forms of harassment and violence in the workplace and will make sure that its employees are provided with a working environment that is respectful of their individual freedoms and privacy.

Any act of violence, aggression, harassment in all its forms, intimidation, bullying, etc. can be considered cruel, inhuman or degrading treatment, as per the definitions given in Article 5 of the Universal Declaration of Human Rights and Article 7 of the International Covenant on Civil and Political Rights.

The Group does not tolerate such behaviour in the workplace and takes all necessary measures to prevent and punish such conduct.

The Group is vigilant not to undermine the privacy of its employees, in particular when collecting personal data or during the use of surveillance systems in the workplace.

The Group is committed to respecting the individual freedoms of its employees to the extent that these are compatible with the employment relationship. Restrictions on these freedoms must be justified by legitimate reasons (such as the protection of people, safety and hygiene, commercial interests, the organization and operation of the company, the ability of the employee to perform their assignment) and be proportionate to the aim pursued.



NHOA strictly monitors every event relating to residence permits.

All Employees of NHOA have the possibility to inform the management, human resources, the Group Ethics & Compliance Officer or via the email ethics-compliance@noha.energy, of any failure to respect this 231 Procedure.



In case of potential failure to respect the Organizational Model of NHOA (including this 231 Procedure and the NHOA Code of Ethics), the Supervisory Body must be informed.

3.4 Rights of local communities

The Group will make sure that its activities do not infringe the rights of local communities surrounding its sites.

It is particularly attentive to the consequences of its activities on their right to health and to a healthy environment, their right to own property, their right to an adequate standard of living (including water, food, housing) and their access to natural resources.

It undertakes to evaluate regularly and at all stages of projects, the potential impacts of its activities on communities, and it will make sure that their expectations are taken into account through dialogue and consultation.

3.5 Security-related human rights

The Group will make sure that assignments related to the security of its employees and assets are conducted with respect for human rights.

In particular, the Group adheres to the Voluntary Principles on Security and Human Rights here available <https://www.voluntaryprinciples.org/>.

3.6 Relations with suppliers and subcontractors



The Group includes in its contracts with its suppliers, contractors and partners a provision requiring the respect by them of the Group's human rights commitments (including laws regarding the regular employment of people and foreigners' workers). It requests its primary suppliers and contractors to commit in the same way with their suppliers and contractors involved in the business relationship and to avoid the use of many suppliers which makes the control ineffective.

It does not solicit or knowingly benefits from acts that infringe human rights, committed by third parties with whom it has a business relationship.

It endeavours to verify the integrity and the reputation of its suppliers, contractors and partners.

It is committed to helping its suppliers, contractors and partners improve their practices.



The Group undertakes to select contractors, suppliers and third commercial parties that respects the human rights of the workers by checking the conditions of the employment agreement.

The Group ensures the best separation of powers and an adequate system of powers of attorney regarding the stipulation of contracts which involve the use of a workforce by the counterparty.

3.7 Relations with public authorities

The Group respects internationally recognized human rights in its relations with public authorities.

The Group will make sure that any request from public authorities is consistent with its ethical commitments in respect of national sovereignty and the principle of political neutrality; it will not intervene in the functioning of political life.

4. ARCHIVING AND DATA RETENTION

Each Business Function involved in the activity described in this 231 Procedure is required to archive and retain all documentation related to the activities described in this document in a manner that precludes subsequent changes, unless appropriate evidence of the changes made is available to enable traceability of the entire process and to facilitate subsequent controls.

The archives ensure adequate protection against damage and loss.

5. ORGANIZATIONAL MODEL

The performance of the activities governed by this 231 Procedure shall be guided by applicable laws and regulations, the Code of Ethics and Conduct, and the Organizational Model adopted by the Company, of which this Procedure 231 shall be considered an integral part. All violations of this 231 Procedure must be reported to the **Group Ethics and Compliance Officer** of NHOA and to the Supervisory Body and may result in the imposition of sanctions on those responsible in accordance with the procedures provided for in the Organizational Model and the regulations in force.