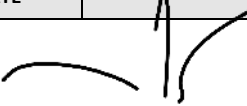




Modern Slavery and Human Trafficking Policy

0	15-Apr-26	Issued for Use	JA	FK	JA			
B	05-Dec-25	Issued for Approval	JA	FK	JH			
A	01-Oct-25	Issued for Project Team Review	JA	FK	JH			
REV	DATE	DESCRIPTION	ORIG	CHK	APPR			
APPROVED BY:								
		DATE: 04/16/2026						
Document Control No.	Asset	Area	Scope	Discipline	Doc Type	Sequence	Sheet	Revision
	WEP	GL	WEP	EHS	POL	0002	-	00

WIRBELN	Modern Slavery and Human Trafficking Policy	
	Doc. No. WEP-GL-WEP-EHS-POL-0002-00	Revision: 00

Change Log

REV	SECTION	CHANGE DESCRIPTION
a	All	None
b	All	Issue for Approval
00	All	Issued for Use

WIRBELN	Modern Slavery and Human Trafficking Policy	
	Doc. No. WEP-GL-WEP- EHS-POL-0002-00	Revision: 00

Table of Contents

DEFINITIONS 4

1. Introduction 5

2. Purpose and Scope 5

3. Policy Statement and Legal Context 5

4. Responsibilities and Governance 5

5. Risk Assessment and Due Diligence 5

6. Supplier Requirements and Contractual Controls 6

7. Training, Awareness and Reporting 6

8. Remediation and Victim Support 6

9. Monitoring, Reporting and Continuous Improvement 6

10. Closing Commitment 6

WIRBELN	Modern Slavery and Human Trafficking Policy	
	Doc. No. WEP-GL-WEP- EHS-POL-0002-00	Revision: 00

DEFINITIONS

Abbreviation	Meaning
Wirbeln	The legal entity issuing this Document
Wirbeln Personnel	Directors, officers, employees, consultants, and workers acting on behalf of Wirbeln
Wirbeln Business Partners	Intermediaries, agents, contractors, suppliers, JV partners, and other third parties
HR	Human Resources
KPI	Key Performance Indicators
TVPA	Trafficking Victims Protection Act

WIRBELN	Modern Slavery and Human Trafficking Policy	
	Doc. No. WEP-GL-WEP- EHS-POL-0002-00	Revision: 00

1. Introduction

We maintain a strict zero-tolerance stance on modern-day slavery, human trafficking, and forced labor across our operations and supply chain; this policy sets clear responsibilities, due-diligence steps, reporting channels, and remediation measures for all employees, contractors, and suppliers worldwide.

2. Purpose and Scope

This policy affirms our commitment to respect human rights and to prevent modern-day slavery, forced labor, debt bondage, and human trafficking in all company operations and supply chains, including contractors and subcontractors. It applies to employees, temporary workers, consultants, suppliers, and business partners worldwide.

3. Policy Statement and Legal Context

We have a zero-tolerance approach: no form of slavery, servitude, forced or compulsory labor, or human trafficking is acceptable. We comply with applicable laws, including the Trafficking Victims Protection Act and related federal statutes that define and criminalize severe forms of trafficking and labor exploitation.

4. Responsibilities and Governance

Senior leadership is accountable for policy enforcement and resourcing. A designated compliance lead will oversee risk assessments, supplier due diligence, training, and reporting. Procurement and project teams must apply the policy in contracts and vendor selection. We will require suppliers to confirm compliance and to provide information on labor practices and remediation plans.

5. Risk Assessment and Due Diligence

We will identify and prioritize higher-risk geographies, sectors, and suppliers and conduct proportionate due diligence before onboarding and periodically thereafter. Due diligence includes document reviews, worker interviews where feasible, and corrective-action plans. Best practice frameworks and template clauses will be used to standardize assessments and contractual protections.

WIRBELN	Modern Slavery and Human Trafficking Policy	
	Doc. No. WEP-GL-WEP- EHS-POL-0002-00	Revision: 00

6. Supplier Requirements and Contractual Controls

Suppliers must:

- Prohibit forced labor and human trafficking in their operations and supply chains.
- Provide transparency on labor practices and subcontracting.
- Cooperate with audits and corrective actions.
Contract terms will include audit rights, remediation timelines, and termination clauses for non-compliance.

7. Training, Awareness and Reporting

We will provide regular training for employees with procurement, HR, and field responsibilities to recognize indicators of exploitation and to follow reporting procedures. A confidential reporting channel will be maintained; all reports will be investigated promptly and impartially, with protections for whistleblowers.

8. Remediation and Victim Support

Where exploitation is identified, we will prioritize the safety and rights of affected individuals, cooperate with authorities, require supplier remediation, and, where appropriate, suspend or terminate relationships. Remediation may include safe repatriation, medical care, and compensation in line with legal obligations and best practice.

9. Monitoring, Reporting and Continuous Improvement

We will monitor compliance through KPIs (e.g., supplier audits completed, corrective actions closed) and publish an annual statement summarizing due-diligence activities and outcomes. We will review this policy at least annually and update it to reflect legal developments and industry best practice.

10. Closing Commitment

We are committed to upholding human dignity across our operations and supply chain. Through governance, due diligence, training, and transparent reporting, we will work to prevent modern-day slavery and to remediate any issues that arise.