



WIRBELN

Policy Statement on Human Rights

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Acronyms & Definitions

Abbreviation	Meaning
ILO	International Labour Organization
UN	United Nations
HSE	Health, Safety and Environment

Term	Definition
Human Rights	The fundamental rights and freedoms inherent to all people, regardless of nationality, race, gender, religion, political opinion, or other status.
Forced Labor	Any work or service exacted from a person under threat, coercion, or penalty and for which the person has not offered themselves voluntarily.
Child Labor	Employment of individuals below the minimum legal working age established by applicable laws and regulations.
Human Trafficking	The recruitment, transportation, transfer, harboring, or receipt of persons through coercion, deception, or abuse for the purpose of exploitation.
Modern Slavery	A broad term encompassing forced labor, debt bondage, servitude, human trafficking, and similar exploitative practices.
Stakeholder	Any individual, group, organization, or community affected by or having an interest in the Company's activities.
Supplier	Any vendor, contractor, subcontractor, consultant, or other external party providing goods or services to the Company.

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1. Purpose

Wirbeln Energy Production LLC ("Wirbeln") recognizes that respect for human rights is fundamental to responsible business conduct and sustainable development. The Company is committed to conducting its activities in a manner that respects the dignity, well-being, and rights of all individuals affected by its operations, including employees, contractors, suppliers, clients, business partners, and communities.

This Policy establishes Wirbeln's commitment to protecting and promoting human rights throughout its operations, projects, and business relationships and provides the framework for integrating human rights considerations into the Company's management systems, decision-making processes, and business practices.

2. Scope

This Policy applies to:

- All directors, officers, employees, and contractors of Wirbeln;
- Temporary personnel, consultants, and agency workers engaged by the Company;
- Suppliers, subcontractors, vendors, and business partners performing work on behalf of Wirbeln; and
- All locations and jurisdictions in which the Company operates.

Wirbeln expects all parties working with or on behalf of the Company to conduct their activities in a manner consistent with the principles outlined in this Policy.

3. Policy Statement

Wirbeln is committed to respecting internationally recognized human rights and conducting business in a manner that promotes fairness, dignity, equality, and respect for all individuals.

The Company supports the principles embodied in:

- The United Nations Universal Declaration of Human Rights;
- The United Nations Guiding Principles on Business and Human Rights;
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work; and

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- Applicable human rights, labor, employment, and occupational health and safety legislation in the jurisdictions where the Company operates.

Wirbeln seeks to identify, prevent, mitigate, and address potential adverse human rights impacts associated with its activities and business relationships.

4. Our Commitments

4.1. Respect and Dignity

Wirbeln is committed to providing a workplace where all individuals are treated with dignity, fairness, and respect.

The Company does not tolerate any form of intimidation, harassment, abuse, discrimination, or degrading treatment and promotes a professional work environment founded on integrity, mutual respect, and equal opportunity.

4.2. Non-Discrimination and Equal Opportunity

Employment decisions within Wirbeln shall be based on qualifications, competence, performance, and business requirements.

The Company is committed to maintaining a workplace free from unlawful discrimination and providing equal opportunities in recruitment, employment, development, training, promotion, and compensation.

4.3. Freedom of Association

Subject to applicable laws and regulations, Wirbeln respects the rights of employees to associate freely, engage in lawful collective activities, and communicate openly regarding workplace matters.

The Company encourages constructive dialogue and maintains open channels for employee communication and feedback.

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4.4. Forced Labor and Human Trafficking

Wirbeln prohibits all forms of forced labor, bonded labor, child labor, human trafficking, and other forms of modern slavery. Detailed requirements, responsibilities, and controls relating to these matters are established within the Company's **Modern Slavery & Human Trafficking Policy (Doc. No. WEP-GL-WEP-EHS-POL-0002-00)**.

4.5. Safe and Healthy Working Conditions

Protecting the health, safety, and well-being of personnel is a core value of Wirbeln.

The Company is committed to:

- Providing safe and healthy working conditions;
- Identifying and managing workplace risks;
- Maintaining effective health, safety, and environmental controls;
- Promoting a positive safety culture; and
- Supporting continual improvement in occupational health and safety performance.

Human rights and worker welfare considerations are integrated into the Company's Health, Safety, and Environmental Management System.

4.6. Fair Employment Practices

Wirbeln seeks to provide fair and lawful employment conditions, including:

- Compliance with applicable wage and working time requirements;
- Fair treatment of employees and contractors;
- Respect for lawful employment rights; and
- Ethical recruitment and employment practices.

The Company supports transparent and responsible workforce management practices throughout its operations.

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4.7. Supply Chain Responsibility

Wirbeln recognizes that human rights risks may arise throughout the supply chain.

Accordingly, the Company expects suppliers, subcontractors, and business partners to:

- Comply with applicable labor and human rights laws;
- Prohibit forced labor, child labor, and human trafficking;
- Provide safe and healthy working conditions;
- Maintain ethical employment practices; and
- Conduct business in a responsible and lawful manner.

Where appropriate, Wirbeln may assess, monitor, or engage with suppliers regarding compliance with these expectations.

4.8. Communities and Stakeholders

Wirbeln strives to conduct its operations in a manner that respects the rights, interests, and well-being of local communities and stakeholders.

The Company seeks to maintain positive and constructive relationships with communities affected by its activities and to consider potential social impacts during project planning and execution.

5. Reporting Concerns

Employees, contractors, suppliers, and other stakeholders are encouraged to report concerns regarding potential violations of this Policy, applicable laws, or ethical standards.

Reports may be made through established management channels or other reporting mechanisms without fear of retaliation.

Wirbeln prohibits retaliation against any individual who, in good faith, raises a concern or participates in an investigation.

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6. Implementation And Responsibilities

Management is responsible for promoting and supporting compliance with this Policy and ensuring that human rights considerations are integrated into relevant business activities and decision-making processes.

All personnel are expected to:

- Understand and comply with this Policy;
- Conduct themselves in a manner consistent with its principles; and
- Promptly report concerns regarding potential violations.

7. Review

This Policy shall be reviewed periodically and updated as necessary to reflect changes in applicable legislation, industry expectations, operational requirements, and best practices.

APPROVAL

Wirbeln Energy Production LLC is committed to conducting business responsibly and respectfully, recognizing that the protection of human rights is fundamental to sustainable business performance, ethical conduct, and long-term value creation.

Approved By: _____

Managing Director

Date: January 08, 2026

