

Human Rights Policy

OHI Group Corporate Policy

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Contents

Human Rights Policy	1
OHI Group Corporate Policy	1
1. Purpose	4
2. Scope	4
3. Our Commitment	5
4. Human Rights Principles	6
4.1 Respect, Dignity and Equality	6
4.2 Fair Employment and Decent Work	6
4.3 Modern Slavery, Forced Labour and Child Labour	6
4.4 Diversity, Equity and Inclusion	7
4.5 Freedom of Association and Employee Dialogue	7
4.6 Health, Safety and Wellbeing	7
4.7 Privacy, Data Protection and Digital Rights	7
4.8 Communities and Social Impact	8
4.9 Responsible Supply Chains	8
4.10 Environmental Responsibility and Human Rights	8
5. Human Rights Due Diligence	9
5.1 Risk Identification and Assessment	9
5.2 Operational and Business Relationship Due Diligence	9
5.3 Responsible Supply Chain Due Diligence	9
5.4 Monitoring, Auditing and Continuous Improvement	10
5.5 Remediation	10
6. Reporting Concerns and Grievance Mechanisms	10
6.1 OHI Group Speak Up Channel	11
6.2 Confidentiality and Non-Retaliation	11
6.3 Investigation and Resolution	11
7. Governance and Accountability	11
7.1 Board of Directors	12
7.2 Audit & Risk Committee	12
7.3 Executive Leadership Team	12
7.4 Group Sustainability & ESG	12
7.5 People & Culture	12
7.6 Legal & Compliance	13
7.7 Business Unit Leaders and Managers	13
7.8 Employees	13
7.9 Suppliers and Business Partners	13
7.10 Internal Audit	14

7.11 Three Lines Model	14
8. Policy Implementation	14
8.1 Communication and Awareness	14
8.2 Training and Capability Building.....	14
8.3 Leadership Responsibilities	15
8.4 Integration into Business Processes	15
8.5 Procurement, Contract Management and Supplier Engagement	15
8.6 Continuous Improvement	15
9. Monitoring, Assurance and Reporting.....	15
9.1 Performance Monitoring	16
9.2 Assurance and Internal Review.....	16
9.3 Management and Board Reporting	16
9.4 External Reporting and Transparency.....	17
9.5 Continuous Improvement	17
10. Policy Review	17
Appendix A	18
Definitions	18
Appendix B	19
International Standards.....	19

1. Purpose

At OHI Group, we believe that respect for human rights is fundamental to responsible business, sustainable growth, and long-term value creation. Our commitment extends across every aspect of our operations, relationships, and value chains in the jurisdictions where OHI Group operates.

The purpose of this Human Rights Policy ("Policy") is to formalise OHI Group's commitment to respecting internationally recognised human rights and integrating these principles into our business activities, decision-making processes, and organisational culture. The Policy establishes the standards and expectations that guide how we treat our employees, workers, suppliers, customers, business partners, and the communities in which we operate.

As one of the GCC's diversified business groups, operating across engineering, construction, industrial services, manufacturing, technology, marine, mobility, and related sectors, OHI Group recognises that our activities have the potential to positively influence the lives of individuals and communities. We are committed to conducting our business ethically, responsibly, and with respect for the dignity, rights, and wellbeing of every person affected by our operations.

This Policy supports OHI Group's Code of Ethics and Business Conduct and forms an integral part of our Environmental, Social and Governance (ESG) framework. It reinforces our commitment to creating safe and inclusive workplaces, promoting fair employment practices, protecting fundamental freedoms, and fostering a culture built on integrity, accountability, and respect.

Our approach is informed by internationally recognised human rights principles and is aligned, where applicable, with:

- The United Nations Universal Declaration of Human Rights (UDHR);
- The United Nations Guiding Principles on Business and Human Rights (UNGPs);
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its Core Conventions;
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- The United Nations Global Compact;
- The United Nations Sustainable Development Goals (SDGs); and
- Applicable laws and regulations in the countries where OHI Group operates.

Where local laws or regulations provide greater protection than this Policy, OHI Group will comply with the higher standard. Where differences exist between local legislation and internationally recognised human rights principles, we will seek to uphold these principles to the greatest extent permitted by law.

Through this Policy, OHI Group reaffirms its commitment to embedding respect for human rights into our governance, operations, procurement practices, business relationships, and community engagement, ensuring that our success is achieved responsibly and contributes positively to the societies in which we operate.

2. Scope

This Human Rights Policy applies to OHI Group and all subsidiaries, controlled entities, and business units operating across the GCC and other markets where we conduct business. Where OHI Group participates in joint ventures, partnerships, or other business arrangements in which it does not have operational control, the Group will use its influence to encourage the adoption of principles consistent with this Policy.

The Policy applies to all individuals working for or on behalf of OHI Group, including:

- Members of the Board of Directors;
- Executive management and officers;
- Permanent and temporary employees;
- Agency workers and secondees; and

- Any third party acting on behalf of, or representing, OHI Group, including suppliers, service providers, consultants, agents, distributors, intermediaries, business partners, and joint venture partners.

OHI Group expects all persons and organisations covered by this Policy to uphold its principles and to conduct their activities in a manner that respects internationally recognised human rights.

The Group is committed to working with suppliers and other business partners who share our values and commitment to ethical and responsible business conduct. We expect those with whom we do business to establish appropriate governance, due diligence, and risk management processes to identify, prevent, mitigate, and address actual or potential human rights risks within their operations, business relationships, and value chains.

Compliance with this Policy forms an integral part of OHI Group's governance framework and should be read in conjunction with the Group's Code of Ethics and Business Conduct, Supplier Code of Conduct, Sustainability Policy, Speak Up Policy, and other applicable corporate policies and standards.

Where contractual obligations or applicable laws impose higher standards than those set out in this Policy, OHI Group will comply with the higher standard. Where local laws conflict with internationally recognised human rights principles, the Group will seek to respect those principles to the greatest extent permitted by law.

3. Our Commitment

At OHI Group, respect for human rights is a fundamental principle that underpins our purpose, values, and approach to responsible business. We recognise that our long-term success depends not only on the quality of the products, services, and solutions we provide, but also on how we treat people, conduct ourselves, and contribute to the communities in which we operate.

We are committed to conducting our business with integrity, fairness, and respect for the dignity and rights of every individual. We believe that protecting human rights is essential to creating safe, inclusive, and productive workplaces, building trusted relationships with our stakeholders, and delivering sustainable value across our operations throughout the Gulf Cooperation Council (GCC).

OHI Group is committed to:

- Respecting internationally recognised human rights across all of our operations, business relationships, and value chains.
- Providing safe, healthy, secure, and inclusive workplaces where everyone is treated with dignity, fairness, and respect.
- Promoting equal opportunity and maintaining workplaces free from discrimination, harassment, bullying, intimidation, exploitation, retaliation, and any form of abuse.
- Prohibiting child labour, forced labour, modern slavery, human trafficking, and all forms of compulsory or exploitative labour.
- Upholding fair employment practices, including fair remuneration, responsible recruitment, respect for freedom of association where recognised by law, and appropriate protection of personal data and privacy.
- Conducting business ethically, transparently, and in compliance with applicable laws and regulations.
- Embedding respect for human rights into our governance, risk management, procurement, investment, and business decision-making processes.
- Working collaboratively with suppliers, customers, business partners, and other stakeholders to strengthen responsible business practices throughout our value chains.
- Supporting the wellbeing, development, engagement, and professional growth of our people.
- Engaging openly with the communities in which we operate and seeking to create positive social, environmental, and economic outcomes.
- Contributing to sustainable development by integrating environmental stewardship, social responsibility, and sound governance into the way we conduct business.

The Board of Directors provides oversight of this commitment, while the Executive Leadership Team is responsible for ensuring that it is embedded throughout OHI Group's governance, operations, and organisational culture. Every director, officer, employee, and any individual or organisation acting for or on behalf of OHI Group is expected to uphold the principles set out in this Policy and to conduct themselves in a manner that reflects OHI Group's values and commitment to responsible business.

Respect for human rights is both a legal and ethical responsibility and an essential element of sustainable business. By placing people at the centre of our decisions, OHI Group strengthens resilience, builds trust, enhances long-term performance, and creates lasting value for our stakeholders and the communities we serve.

4. Human Rights Principles

4.1 Respect, Dignity and Equality

OHI Group is committed to fostering a workplace where every individual is treated with dignity, fairness, and respect. We recognise that every person has inherent rights and deserves to work in an environment that is safe, inclusive, and free from discrimination, intimidation, harassment, exploitation, or abuse.

We are committed to:

- Treating all individuals with dignity, courtesy, and respect.
- Promoting equality of opportunity and fair treatment throughout employment.
- Maintaining a workplace free from discrimination, harassment, bullying, victimisation, and violence.
- Respecting cultural diversity, individual beliefs, and personal differences.
- Taking prompt and appropriate action to address any behaviour that undermines these principles.

4.2 Fair Employment and Decent Work

OHI Group is committed to providing fair, lawful, and ethical employment practices that promote decent work, protect workers' rights, and support individual wellbeing.

We are committed to:

- Providing written employment contracts that clearly define terms and conditions of employment.
- Complying with applicable labour laws relating to working hours, overtime, leave, and rest periods.
- Providing fair and competitive remuneration, benefits, and working conditions.
- Applying equal pay principles for work of equal value.
- Ensuring recruitment and employment decisions are based on merit, qualifications, competence, and business needs.
- Respecting the rights and dignity of migrant workers and ensuring they receive the same protections afforded to all employees.

4.3 Modern Slavery, Forced Labour and Child Labour

OHI Group has zero tolerance for modern slavery, forced labour, bonded labour, debt bondage, human trafficking, or child labour in any part of our operations or supply chain.

We are committed to:

- Prohibiting all forms of forced, compulsory, or involuntary labour.
- Prohibiting the employment of children below the minimum legal working age.
- Ensuring employees are free to leave employment after providing appropriate notice in accordance with applicable laws and contractual obligations.
- Prohibiting the retention of passports, identity documents, or personal belongings as a condition of employment.
- Prohibiting recruitment fees being charged to workers.

- Conducting appropriate due diligence to identify and address modern slavery risks throughout our supply chain.
- Working with suppliers and business partners to promote equivalent commitments and address identified risks through appropriate corrective actions.

4.4 Diversity, Equity and Inclusion

OHI Group values diversity and believes an inclusive workforce strengthens innovation, collaboration, and organisational performance.

We are committed to:

- Providing equal opportunities throughout recruitment, development, promotion, and reward.
- Building a workplace that values diversity of thought, background, experience, and perspective.
- Promoting inclusive leadership and equitable employment practices.
- Supporting accessibility and removing unnecessary barriers to participation.
- Creating an environment where everyone feels respected, valued, and able to contribute fully.

4.5 Freedom of Association and Employee Dialogue

OHI Group respects the rights of employees to freedom of association and, where permitted by law, collective bargaining.

We are committed to:

- Respecting employees' rights to join or not join lawful organisations of their choice.
- Maintaining open, constructive, and respectful dialogue with employees and their representatives.
- Encouraging consultation, engagement, and participation in matters affecting the workplace.
- Prohibiting discrimination or retaliation against individuals exercising these rights.

4.6 Health, Safety and Wellbeing

Protecting the health, safety, and wellbeing of our people is fundamental to OHI Group's values and operational excellence. We are committed to providing workplaces where everyone returns home safely every day and where wellbeing is actively supported.

We are committed to:

- Providing safe and healthy working environments that meet or exceed applicable legal and industry requirements.
- Identifying, assessing, and controlling workplace risks through effective health, safety, and environmental management systems.
- Promoting a proactive safety culture founded on leadership, accountability, learning, and continuous improvement.
- Supporting physical, mental, and emotional wellbeing through appropriate programmes and resources.
- Encouraging psychological safety where employees feel confident to raise concerns, report hazards, and stop unsafe work without fear of retaliation.
- Maintaining a culture in which every individual shares responsibility for preventing harm and protecting one another.

4.7 Privacy, Data Protection and Digital Rights

OHI Group respects the privacy of individuals and is committed to protecting personal information and ensuring the responsible use of technology.

We are committed to:

- Processing personal data lawfully, fairly, and transparently in accordance with applicable privacy legislation.
- Protecting confidential information through appropriate technical and organisational safeguards.

- Maintaining robust cybersecurity practices to safeguard information assets.
- Promoting the responsible, ethical, and secure use of digital technologies, including artificial intelligence.
- Respecting the digital rights and privacy of employees, customers, suppliers, and other stakeholders.

4.8 Communities and Social Impact

OHI Group recognises that responsible business extends beyond our workplaces. We seek to contribute positively to the communities in which we operate by creating long-term social, economic, and environmental value.

We are committed to:

- Respecting the rights, cultures, and interests of local communities.
- Engaging openly and transparently with stakeholders affected by our activities.
- Supporting local employment, skills development, and economic participation wherever practicable.
- Investing in initiatives that contribute to education, community wellbeing, and sustainable development.
- Managing our operations responsibly to minimise adverse impacts on communities and maximise positive outcomes.

4.9 Responsible Supply Chains

OHI Group expects suppliers and other business partners to uphold standards consistent with this Policy and to operate responsibly throughout their own operations and value chains.

We are committed to:

- Integrating human rights considerations into supplier selection, procurement, contracting, and third-party management processes.
- Requiring relevant suppliers and business partners to comply with the OHI Group Supplier Code of Conduct and other applicable contractual requirements.
- Conducting risk-based due diligence and assessments of suppliers and business partners, commensurate with the nature, scale, and risk of the relationship.
- Working collaboratively with suppliers and business partners to address identified risks, strengthen human rights performance, and promote continuous improvement.
- Taking appropriate corrective action, including remediation, suspension, or termination of business relationships where serious or repeated human rights violations are identified and remain unaddressed.

4.10 Environmental Responsibility and Human Rights

OHI Group recognises the close relationship between environmental stewardship and the protection of human rights. A clean, healthy, and sustainable environment is fundamental to the wellbeing of current and future generations.

We are committed to:

- Integrating environmental responsibility into our business decisions and operational practices.
- Preventing pollution and reducing our environmental footprint wherever practicable.
- Managing water, energy, waste, and natural resources responsibly.
- Supporting climate resilience through sustainable business practices and continuous improvement.
- Protecting biodiversity and promoting responsible environmental management across our operations.
- Recognising that environmental protection contributes directly to healthier communities, safer workplaces, and long-term social and economic resilience.

5. Human Rights Due Diligence

OHI Group is committed to identifying, preventing, mitigating, and addressing actual and potential human rights impacts arising from our operations, business activities, business relationships, and value chains. We recognise that effective human rights due diligence is an ongoing process that enables responsible decision-making, strengthens organisational resilience, and supports sustainable business performance.

Human rights considerations are integrated into OHI Group's enterprise risk management, strategic and operational planning, procurement and supply chain management, business activities, and governance processes to ensure risks are proactively identified, assessed, and managed throughout the business lifecycle.

To achieve this, OHI Group will:

5.1 Risk Identification and Assessment

Identify and assess actual and potential human rights risks associated with our operations, projects, business activities, and supply chains, taking into account the nature of our work, geographical locations, workforce composition, and business relationships.

Risk assessments will consider factors including:

- Country and regional human rights risks;
- Labour practices and workforce welfare;
- Modern slavery and human trafficking risks;
- Health, safety, and wellbeing;
- Environmental and community impacts;
- Supplier and business partner performance; and
- Emerging regulatory and ESG requirements.

5.2 Operational and Business Relationship Due Diligence

Human rights considerations will be integrated throughout the lifecycle of OHI Group's operations, business activities, services, and projects, as appropriate. This includes strategic planning, procurement, mobilisation, implementation, operation, maintenance, and decommissioning or close-out, where applicable.

Where appropriate, activity-specific human rights assessments will be undertaken to identify actual or potential impacts on employees, workers, customers, suppliers, business partners, local communities, and other affected stakeholders.

5.3 Responsible Supply Chain Due Diligence

OHI Group adopts a risk-based approach to managing suppliers, service providers, and other business partners.

Where appropriate, third parties may be subject to:

- Human rights, ethical, and sustainability due diligence during onboarding;
- Periodic assessments, reviews, and monitoring of performance;
- Compliance with the OHI Group Supplier Code of Conduct and applicable contractual requirements;
- Assessments of modern slavery, labour practices, and other human rights risks;
- Commitments relating to responsible business conduct; and
- Ongoing engagement to monitor performance and address identified risks.

Where significant risks or non-compliance are identified, OHI Group will seek to work collaboratively with suppliers and business partners to implement appropriate corrective actions and, where

necessary, remediation measures. Persistent or serious breaches may result in the suspension or termination of the relationship.

5.4 Monitoring, Auditing and Continuous Improvement

Human rights due diligence is supported through ongoing monitoring, internal reviews, audits, assessments, inspections, stakeholder engagement, and performance reporting.

OHI Group will regularly review the effectiveness of its human rights practices, controls, and processes to identify opportunities for improvement and ensure alignment with evolving regulatory requirements, international standards, and stakeholder expectations.

Findings from audits, investigations, employee feedback, grievance mechanisms, and stakeholder engagement will be used to strengthen controls, improve policies and procedures, enhance awareness and training, and drive continuous improvement across the Group.

5.5 Remediation

Where OHI Group identifies that it has caused or contributed to an adverse human rights impact, we are committed to taking timely and appropriate action to prevent recurrence and, where appropriate, provide or cooperate in remediation.

Where impacts are directly linked to our business relationships, we will use our influence to encourage appropriate corrective actions and responsible remediation.

Human rights concerns may be raised through the OHI Group Speak Up Channel or other established reporting mechanisms and will be investigated promptly, fairly, and confidentially in accordance with applicable policies and procedures.

6. Reporting Concerns and Grievance Mechanisms

OHI Group encourages a culture of openness, integrity, and accountability in which employees and stakeholders feel empowered to raise concerns about actual or potential human rights impacts, misconduct, or breaches of this Policy without fear of retaliation. We believe that early reporting, effective investigation, and appropriate resolution of concerns are fundamental to protecting individuals, maintaining trust, and upholding our commitment to responsible business.

Employees, workers, suppliers, business partners, and other stakeholders are encouraged to report any actual or suspected breaches of this Policy, the OHI Group Code of Ethics and Business Conduct, applicable laws, or internationally recognised human rights standards through the appropriate reporting channels.

Examples of reportable concerns include, but are not limited to:

- Discrimination, harassment, bullying, intimidation, or abuse;
- Forced labour, modern slavery, human trafficking, child labour, or exploitative labour practices;
- Unsafe or unhealthy working conditions;
- Unethical recruitment practices, unfair employment practices, or violations of workers' rights;
- Human rights risks or impacts involving suppliers, business partners, or other third parties;
- Retaliation or adverse treatment of individuals who raise concerns in good faith; and
- Any other conduct that may adversely affect the rights, dignity, health, safety, or wellbeing of employees, workers, communities, or other stakeholders.

All concerns raised will be handled in accordance with OHI Group's established reporting, investigation, and grievance management processes. OHI Group is committed to protecting confidentiality, respecting privacy, and ensuring that individuals who raise concerns in good faith are protected from retaliation.

6.1 OHI Group Speak Up Channel

OHI Group maintains a confidential Speak Up Channel through which concerns may be raised securely and, where permitted by applicable law, anonymously.

Reports may be submitted by employees or external stakeholders in good faith and without fear of retaliation. All reports will be handled sensitively, impartially, and in accordance with OHI Group's policies and applicable legal requirements.

6.2 Confidentiality and Non-Retaliation

OHI Group is committed to protecting individuals who raise concerns honestly and in good faith.

Information relating to reported concerns will be treated confidentially and shared only with those responsible for assessing, investigating, and resolving the matter.

The Group prohibits any form of retaliation, intimidation, victimisation, or adverse treatment against any individual who reports a concern, participates in an investigation, or assists in resolving a human rights issue in good faith. Any act of retaliation will be treated as a serious breach of the OHI Group Code of Ethics and Business Conduct and may result in disciplinary action.

6.3 Investigation and Resolution

All reported concerns will be reviewed promptly and, where appropriate, investigated by the OHI Group Corporate Compliance & Investigations Team, working in collaboration with relevant business functions such as People & Culture, Legal, HSSE, Procurement, Internal Audit, or other subject matter experts as required.

Investigations will be conducted objectively, fairly, and in accordance with the principles of confidentiality, procedural fairness, and respect for all parties involved.

Where a breach of this Policy is identified, OHI Group will take appropriate corrective action, which may include:

- Implementing corrective or preventive measures;
- Strengthening policies, procedures, or internal controls;
- Providing additional training or awareness programmes;
- Developing remediation plans for affected individuals or communities, where appropriate;
- Requiring corrective action by suppliers, business partners, or other third parties; and
- Applying disciplinary measures or terminating business relationships where serious or repeated breaches occur.

OHI Group is committed to using the findings from investigations to strengthen governance, improve organisational learning, and promote a culture of continuous improvement across the Group.

7. Governance and Accountability

Respect for human rights is a shared responsibility across OHI Group. Effective governance requires leadership commitment, clear accountability, robust oversight, and active participation at every level of the organisation.

The Board of Directors, Executive Leadership Team, managers, employees, and business partners each play an important role in ensuring that human rights principles are embedded within the Group's culture, decision-making processes, and business operations.

7.1 Board of Directors

The Board of Directors has overall responsibility for overseeing OHI Group's commitment to human rights and ensuring that appropriate governance frameworks are in place to support responsible business conduct.

The Board is responsible for:

- Approving this Human Rights Policy and any subsequent amendments.
- Providing strategic oversight of human rights and broader ESG matters.
- Promoting a culture of integrity, ethical conduct, and accountability throughout the Group.
- Receiving assurance that effective governance, risk management, and internal control systems are in place to manage human rights risks.

7.2 Audit & Risk Committee

The Audit & Risk Committee supports the Board by overseeing the effectiveness of governance, risk management, compliance, and internal control processes relating to human rights.

Responsibilities include:

- Reviewing significant human rights risks and emerging issues.
- Monitoring the effectiveness of risk management and compliance frameworks.
- Receiving reports on significant investigations, material incidents, and corrective actions where appropriate.
- Providing assurance to the Board regarding the effectiveness of governance arrangements.

7.3 Executive Leadership Team

The Executive Leadership Team is responsible for implementing this Policy across OHI Group and ensuring that respect for human rights is integrated into business strategy, operational planning, and decision-making.

The Executive Leadership Team will:

- Demonstrate visible leadership and accountability.
- Allocate appropriate resources to implement this Policy.
- Promote ethical business conduct throughout the organisation.
- Ensure appropriate actions are taken where risks or breaches are identified.

7.4 Group Sustainability & ESG

The Group Sustainability & ESG function is responsible for maintaining this Policy and supporting its implementation across the Group.

Responsibilities include:

- Monitoring emerging human rights and ESG developments.
- Supporting due diligence and risk assessments.
- Developing awareness and training programmes.
- Monitoring performance and supporting ESG reporting.
- Periodically reviewing this Policy to ensure alignment with international standards and business needs.

7.5 People & Culture

The People & Culture function is responsible for embedding human rights principles throughout the employee lifecycle.

This includes:

- Fair recruitment and employment practices.
- Equal opportunity and inclusion.

- Employee wellbeing.
- Learning and development.
- Supporting grievance processes where appropriate.

7.6 Legal & Compliance

The Legal & Compliance function is responsible for providing advice on legal obligations relating to human rights, monitoring regulatory developments, supporting investigations, and maintaining effective compliance processes.

Working alongside the Corporate Compliance & Investigations Team, Legal & Compliance will support the implementation of appropriate corrective actions where required.

7.7 Business Unit Leaders and Managers

Business Unit Leaders and Managers are responsible for implementing this Policy within their areas of responsibility and ensuring that human rights considerations are embedded into day-to-day activities, decision-making, and operational practices.

They are expected to:

- Lead by example and demonstrate OHI Group's commitment to respecting human rights.
- Promote safe, respectful, inclusive, and supportive working environments.
- Identify, assess, and manage human rights risks relevant to their activities.
- Ensure employees and relevant third parties understand their responsibilities under this Policy.
- Encourage employees and stakeholders to raise concerns and support a culture of openness and accountability.
- Ensure appropriate actions are taken promptly to address identified issues and prevent recurrence.
- Escalate significant human rights risks, incidents, or concerns through the appropriate governance channels.

7.8 Employees

Every employee shares responsibility for upholding the principles contained within this Policy.

Employees are expected to:

- Treat others with dignity and respect.
- Comply with this Policy and related Group policies.
- Complete required training.
- Report suspected human rights concerns.
- Cooperate with investigations where required.

7.9 Suppliers and Business Partners

OHI Group expects suppliers and business partners to operate in accordance with the principles of this Policy and the OHI Group Supplier Code of Conduct.

Third parties are expected to:

- Respect internationally recognised human rights.
- Maintain responsible employment and ethical business practices.
- Conduct appropriate due diligence within their own operations, business relationships, and value chains.
- Cooperate with OHI Group where assessments, reviews, or investigations are undertaken.
- Implement timely corrective actions and remediation measures where human rights risks or concerns are identified.

7.10 Internal Audit

Internal Audit provides independent and objective assurance regarding the effectiveness of OHI Group's governance, risk management, and internal control processes relating to human rights.

Internal Audit may review:

- Compliance with this Policy and related standards.
- Effectiveness of human rights due diligence processes.
- Implementation and effectiveness of corrective actions.
- Governance, accountability, and reporting arrangements.
- The maturity and effectiveness of the Group's human rights management framework.

Findings and recommendations will be reported to appropriate management forums and the Audit & Risk Committee, supporting continuous improvement across the Group.

7.11 Three Lines Model

Line of Defence	Responsibility
First Line	Business Units, leaders, managers, and employees own and manage human rights risks within their areas of responsibility and day-to-day activities.
Second Line	Group Sustainability & ESG, People & Culture, Legal & Compliance, Risk, and other relevant functions provide frameworks, guidance, oversight, monitoring, and support.
Third Line	Internal Audit provides independent assurance on the effectiveness of governance, risk management, and internal controls to the Board and Audit & Risk Committee.

8. Policy Implementation

OHI Group is committed to embedding respect for human rights throughout its governance, operations, and business relationships. The effective implementation of this Policy requires leadership commitment, employee engagement, and the integration of human rights considerations into the Group's management systems, operational processes, and decision-making.

To support the implementation of this Policy, OHI Group will:

8.1 Communication and Awareness

This Policy will be made available to all employees and relevant stakeholders through appropriate internal and external communication channels.

OHI Group will promote awareness of its human rights commitments through regular communications, leadership engagement, and awareness campaigns, reinforcing the importance of ethical conduct and responsible business practices throughout the organisation.

8.2 Training and Capability Building

Appropriate education and training will be provided to employees, managers, and other relevant personnel to ensure they understand their responsibilities under this Policy and are equipped to identify, prevent, and respond to potential human rights risks.

Specialised training may be provided to functions with elevated responsibilities, including procurement, People & Culture, Legal & Compliance, HSSE, project management, and leadership teams.

8.3 Leadership Responsibilities

Leaders at every level of OHI Group are responsible for demonstrating visible commitment to this Policy and fostering a culture that promotes respect, integrity, accountability, and inclusion.

Leaders are expected to:

- Lead by example and uphold the principles of this Policy.
- Encourage open dialogue and the reporting of concerns.
- Ensure human rights considerations are incorporated into operational decision-making.
- Support timely corrective action where issues are identified.

8.4 Integration into Business Processes

Human rights considerations will be incorporated, where appropriate, into OHI Group's governance, operational, and commercial processes, including:

- Enterprise risk management;
- Project planning and delivery;
- Procurement and sourcing activities;
- Contractor and supplier management;
- People & Culture processes;
- Health, Safety, Security and Environment (HSSE) management systems;
- ESG reporting and performance monitoring; and
- Business continuity and operational resilience planning.

This integrated approach supports the identification, management, and mitigation of human rights risks throughout the business lifecycle.

8.5 Procurement, Contract Management and Supplier Engagement

OHI Group will seek to work with suppliers, service providers, consultants, and other business partners who share our commitment to ethical, responsible, and sustainable business practices.

Human rights expectations will be reflected, where appropriate, within procurement processes, supplier onboarding, contractual arrangements, third-party due diligence, and ongoing supplier and business partner performance management.

Where material human rights risks are identified, OHI Group may undertake proportionate due diligence, request corrective action plans, conduct assessments, engage with relevant third parties to address concerns, or take other appropriate measures, including suspension or termination of relationships where serious or unresolved issues remain.

8.6 Continuous Improvement

OHI Group is committed to continually strengthening its human rights management framework through regular review, stakeholder engagement, lessons learned, internal assessments, and evolving international best practice.

The Group will periodically evaluate the effectiveness of this Policy and its implementation, making improvements where necessary to ensure it remains relevant, effective, and aligned with changing business needs, stakeholder expectations, and regulatory developments.

9. Monitoring, Assurance and Reporting

OHI Group is committed to monitoring the effectiveness of this Policy and continually strengthening its approach to respecting and protecting human rights. We recognise that effective governance requires regular performance evaluation, independent assurance, transparent reporting, and a commitment to continuous improvement.

The Group will monitor the implementation of this Policy through established governance, risk management, compliance, and operational processes to ensure that human rights commitments remain embedded across our business and supply chain.

9.1 Performance Monitoring

OHI Group will establish appropriate measures to assess the effectiveness of its human rights programme and identify opportunities for improvement.

Performance monitoring may include:

- Human rights risk assessments;
- Workforce health, safety, and wellbeing indicators;
- Employee engagement and grievance trends;
- Human rights-related incidents and investigations;
- Completion of mandatory training and awareness programmes;
- Supplier due diligence and compliance activities; and
- Progress against ESG objectives and strategic commitments.

Where appropriate, key performance indicators (KPIs) will be developed and reviewed to support informed decision-making and continuous improvement.

9.2 Assurance and Internal Review

OHI Group will undertake periodic reviews to evaluate compliance with this Policy and the effectiveness of associated governance and management systems.

Assurance activities may include:

- Internal audits;
- Compliance reviews;
- Site inspections;
- Management system assessments;
- Supplier audits and performance evaluations;
- Investigation outcomes and lessons learned; and
- Independent assurance, where appropriate.

The findings of these activities will be used to strengthen controls, improve business processes, and address emerging risks.

9.3 Management and Board Reporting

Material human rights matters will be reported through OHI Group's governance framework to ensure appropriate oversight and accountability.

Regular reporting may include:

- Significant human rights risks and emerging issues;
- Material incidents and investigation outcomes;
- Status of corrective and preventive actions;
- Supply chain due diligence activities;
- Progress against strategic objectives and improvement initiatives; and
- Emerging legal, regulatory, or ESG developments.

Where appropriate, the Board of Directors and the Audit & Risk Committee will receive updates on significant human rights matters as part of the Group's governance and risk oversight processes.

9.4 External Reporting and Transparency

OHI Group is committed to transparent and responsible reporting of its environmental, social, and governance (ESG) performance.

Where appropriate, the Group may disclose information relating to its human rights commitments, governance arrangements, due diligence activities, and performance through sustainability reports, ESG disclosures, annual reports, or other corporate reporting mechanisms.

Such reporting will seek to reflect recognised international reporting frameworks and applicable regulatory requirements.

9.5 Continuous Improvement

OHI Group recognises that respecting human rights is an ongoing journey requiring continual learning, collaboration, and improvement.

The Group will regularly review its policies, management systems, governance arrangements, and operational practices to ensure they remain effective, proportionate, and aligned with international best practice.

Lessons learned from audits, investigations, stakeholder engagement, risk assessments, and changes in the external operating environment will be used to strengthen the Group's human rights programme and enhance organisational resilience.

10. Policy Review

This Policy shall be reviewed at least every two years to ensure it remains relevant, effective, and aligned with organisational objectives, legal requirements, and recognised good practice.

An earlier review may be initiated where there are:

- Changes in applicable legislation or regulatory requirements
- Significant organisational or operational changes
- Lessons learned from implementation, audits, incidents, or stakeholder feedback
- Emerging human rights risks or evolving expectations relating to responsible business practices

The review process shall consider feedback from relevant stakeholders and identify opportunities for continuous improvement.

Any material changes to this Policy shall be subject to review and approval through the appropriate governance process.

Appendix A

Definitions

For the purposes of this Policy, the following definitions apply:

Human Rights

The fundamental rights, freedoms, and standards of treatment to which all people are entitled, regardless of nationality, gender, ethnicity, age, religion, disability, or other status. These include rights relating to dignity, equality, safety, fair treatment, and freedom from exploitation or abuse.

Forced Labour

Any work or service that a person is compelled to perform under threat of penalty, coercion, intimidation, or restriction of freedom and for which the person has not offered themselves voluntarily.

Modern Slavery

A collective term referring to severe forms of exploitation, including forced labour, slavery, servitude, and human trafficking, where individuals are deprived of their freedom and exploited for personal or commercial gain.

Human Trafficking

The recruitment, transportation, transfer, harbouring, or receipt of individuals through improper means, including force, coercion, deception, or abuse of vulnerability, for the purpose of exploitation.

Child Labour

Work that deprives children of their childhood, potential, dignity, or development, or that is harmful to their physical or mental development. This includes employment that does not comply with applicable minimum age requirements or international labour standards.

Stakeholder

Any individual, group, organisation, or entity that may affect, be affected by, or have an interest in OHI Group's activities, including employees, workers, customers, suppliers, communities, regulators, and shareholders.

Supplier

Any organisation or third party that provides goods, services, labour, expertise, or support to OHI Group or its operating entities.

Worker

Any individual performing work or services for OHI Group, including employees, temporary workers, agency workers, subcontracted personnel, and other individuals engaged through employment or contractual arrangements.

Living Wage

A level of remuneration that enables workers and their families to meet their basic needs and maintain an acceptable standard of living, taking into account local economic and social conditions.

Vulnerable Worker

An individual or group who may be at greater risk of experiencing exploitation, discrimination, harm, or barriers to exercising their rights due to factors such as age, migration status, disability, employment status, social circumstances, or limited ability to access support.

Due Diligence

A proactive process to identify, assess, prevent, mitigate, monitor, and communicate risks and impacts associated with business activities, including human rights risks within operations and supply chains.

Appendix B

International Standards

This Policy is guided by, and aligned with, internationally recognised principles and standards, including:

- Universal Declaration of Human Rights (UDHR)
Establishes fundamental human rights and freedoms applicable to all people.
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
Provides a global framework for businesses to respect human rights and address adverse impacts associated with their activities.
- International Labour Organization (ILO) Core Conventions
Defines fundamental principles and rights at work, including freedom of association, elimination of forced labour, abolition of child labour, and elimination of discrimination in employment.
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
Provides recommendations for responsible business practices, including human rights, labour, environment, and supply chain due diligence.
- United Nations Global Compact (UNGC)
Supports businesses in aligning their strategies and operations with universal principles relating to human rights, labour, environment, and anti-corruption.
- United Nations Sustainable Development Goals (UN SDGs)
Provides a framework for contributing to sustainable development through responsible business practices.
- IFC Performance Standards (where applicable)
Provides guidance on managing environmental and social risks and impacts associated with projects and investments.
- Applicable National Legislation and Regulations
Including labour, employment, health and safety, environmental, data protection, and privacy requirements in the countries where OHI Group operates.