



Human Rights Policy



Document manager:	CEO
Distribution:	Board of Directors
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1. Purpose

The purpose of the Human Rights Policy is to set guidelines and rules for how the Eolus group of companies (“Eolus”) works to respect human rights and manages associated risks. The overall view is that such risks shall be avoided and if identified, mitigated.

1. Policy statement

Eolus supports and respects international conventions on labour conditions and human rights, including vulnerable groups, throughout our entire value chain. Eolus promotes freedom of association and the right to collective bargaining and have a zero tolerance against any forms of forced or child labour, both in our own operations and in our supply chain. Eolus shall not be complicit in any human rights or labour rights abuses throughout the course of our business.

Our commitment to respecting human rights

We have committed ourselves to respecting international conventions on labour conditions and human rights, including vulnerable groups, throughout our entire value chain. We require that our business partners and suppliers do the same, and follow the requirements set forth in our Code of Conduct.

In accordance with the UN Guiding Principles on Business and Human Rights we strive to achieve the highest standards, whilst ensuring that we comply with international laws and regulations. In situations where a direct conflict between the two arises, Eolus will follow local legislation whilst simultaneously working to find ways to respect human rights to the largest extent possible.

In practical terms, we commit ourselves to:

1. Follow the UN Guiding Principles on Business and Human Rights, the UN Declaration on the Rights of Indigenous Peoples, the Organisation for Economic Co-operation, and Development (OECD) guidelines for multinational enterprises, the International Labour Organizations (ILO’s) eight core conventions and the principles of UN Global Compact.
2. Promote diversity and equal opportunities both within and outside of our organisation.
3. Treat every human with dignity and respect and actively work to counteract all forms of child labour, slavery, harassment, and discrimination throughout our entire value chain.
4. Offer a safe and healthy work environment and reasonable working hours, salaries, and benefits.
5. Engage with relevant stakeholders and provide opportunities for dialogue and collaboration in planning and design of projects that may impact local communities, and support community involvement initiatives across our value chain.
6. Respect indigenous people’s rights, with the aim of obtaining indigenous peoples’ Free, Prior, and Informed Consent (FPIC) in each project process.
7. Use our influence and partnerships to not only respect but find ways to have a positive impact on human rights.

2. Relevant Entity

The policy applies to all entities and projects within Eolus.

3. Roles and Responsibilities

The CEO is responsible for this policy. The policy is approved by the Board of Directors and reviewed annually.

4. Monitoring of compliance

Non-compliance with this policy shall be reported via Eolus system for deviations, where the responsible function follows up. Annually ensure that:

- The Board of Directors is informed about our work in regard to Human Rights, which includes aspects relating to indigenous people's interests.

5. Exceptions

Any need for exceptions to this policy should be well documented and reviewed and approved by the CEO and reported to the Board of Directors.

6. Document reference list

In the creation of this policy, the following references have been used:

1. The Universal Declaration of Human Rights (UDHR) <https://www.un.org/en/about-us/universal-declaration-of-human-rights>
2. The UN Guiding Principles on Business and Human Rights https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf
3. OECD Guidelines for Multinational Enterprises <https://www.oecd.org/daf/inv/mne/48004323.pdf>
4. International Labour Organization, specifically the following documents (<https://ilo.org>):
 - Forced Labour Convention 1930 (C.29)
 - Freedom of Association and Protection of the Right to Organise Convention 1948 (C.87)
 - Right to Organise and Collective Bargaining Convention 1949 (C.98)
 - Equal Remuneration Convention 1951 (C.100)
 - Abolition of Forced Labour 1957 (C.105)
 - Discrimination (Employment and Occupation) Convention 1958 (C.111)
 - Minimum Age Convention 1973 (C.138)
 - Worst Forms of Child Labour Convention 1999 (C.182)
5. UN Global Compact <https://unglobalcompact.org/>
6. Free, Prior and Informed Consent – An Indigenous People's right and good practice for local communities <https://www.fao.org/3/i6190e/i6190e.pdf>
7. Eolus Guidelines for respecting Indigenous Peoples Rights
8. Eolus Code of Conduct https://www.eolusvind.com/wp-content/uploads/2022/05/2022_Code_of_Conduct_Eolus.pdf