



SAVANNAH ENERGY

Delivering *Projects that Matter*

Policy - Global

POL.CMP.HRP.017 - Human Rights Policy

Date: 25/11/2024 Revision: 2.0



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Approval

The signatures below certify that this document has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position
Prepared by	Titilayo Okoye	Yearly document review: Titilayo Okoye, 11/25/2024	Chief Compliance Officer
Reviewed by	Titilayo Okoye	Assignment Signature: Titilayo Okoye, 9/12/2023	Chief Compliance Officer
Approved by	Andrew Knott	Approval Signature: Andrew Knott, 9/20/2023	Chief Executive Officer

Amendment Record

This document is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Date	Context	Revision
Sept-2023	1 st version published on DMS - M-Files	1.0
Nov-2024	Yearly review: Minor change – template review	2.0

Company Proprietary Information

The electronic version of this document is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this document is uncontrolled, except when provided with a document reference number and revision in the field below:

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1. Introduction

We seek to act in accordance with internationally recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way we operate. We work to guard against being complicit in human rights violations and to uphold the human rights of our people and any other individuals with whom we are in contact, either directly or indirectly.

2. Scope

Our Human Rights Policy applies to all persons working on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. Principles

We will:

- seek to avoid causing or contributing to adverse human rights impacts through our own activities or employment and address such impacts, if they do occur, in a timely and appropriate manner;
- seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, employment and through our business relationships;
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts;
- continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

4. Policy

This sets out our position with respect to human rights and modern slavery and sits alongside our Health and Safety Policy.

Our statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work:

- Child Labour:** Savannah Energy will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships,



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internships and other similar programmes that comply with the applicable laws and regulations.

- ii. **Modern slavery:** Savannah Energy will not use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the Company and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero tolerance approach towards human trafficking.
- iii. **Health, Safety and Hygiene:** All Savannah Energy employees will work in an environment that is both safe and healthy, in line with our Health and Safety Policies.
- iv. **Discipline:** Savannah Energy prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees in our employee policies. All disciplinary measures of a serious nature are recorded and actioned.
- v. **Freedom of Association and Employee Representation:** Savannah Energy recognises that all its employees have the right to form and join organisations of their own choosing as long as this is in line with relevant country employment law and the regulatory requirements of our business. The Company takes active measures to seek employees' views about the Company, respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.
- vi. **Working Hours:** Savannah Energy will ensure that working hours are reasonable and comply with the law and industry standards.
- vii. **Equality of Treatment:** Savannah Energy is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment as outlined in our employment policies.
- viii. **Employment terms:** Savannah Energy will provide written and clear contracts which detail the terms and conditions of its staff employment. We will ensure that work performed by employees is on the basis of recognised employment law and practice.



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- ix. **Remuneration:** Savannah Energy will, at a minimum, provide wages and benefits that meet national standards. We will provide employees with clear written information on their pay and conditions. The Company prohibits deductions on employees' wages as a disciplinary measure. Savannah Energy is committed to equal pay and benefits for men and women for work of equal value.

5. Grievance and remediation

Where a human rights violation is identified, we will work with all parties involved to seek access to remedy, compensation and justice for the victim. We will also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring. Our 'Speak up' helpline is available to all employees who come across unethical behaviour that can't be resolved locally or for which the normal consultation process isn't suitable. Anyone raising a genuine concern which is in the public interest will be protected from victimisation. Third parties (including suppliers) can also telephone the helpline.

6. How to report an unethical behaviour or concern(s)

- Simply log into the SPEAK UP portal which is located in the Compliance Folder on the Savannah Energy Intranet Page to log in your concern(s). The Speak Up portal is independently administered by a 3rd party service provider.
- If you wish to access it without going through the Company Intranet or you are a 3rd party, you can make use of the toll free lines provided below .
- Dial the Toll Free lines
 - United Kingdom – 0800 048 8465
 - Niger – (503) 748-0479
 - Nigeria - 0-708-060-1816 followed by (844) 951-1992

7. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



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8. Responsibility for this policy

- i. The [board of directors] has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- ii. Savannah's Chief Compliance Officer is responsible for implementing the Company's Human Rights Policy.