

HUMAN RIGHTS POLICY & GUIDELINES

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CONTENTS

DOCUMENT CHANGE CONTROL	3
1. POLICY STATEMENT	4
2. RESPONSIBILITY FOR THE POLICY	4
3. COMPLIANCE WITH THE POLICY.....	4
4. COMMUNICATION AND AWARENESS OF THIS POLICY.....	5
5. BREACHES OF THIS POLICY	5


Document Change Control

All changes are to be agreed and authorised by the CEO.

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Document Sign-off

	Signed	Date
CEO		31 March 2023

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1. POLICY STATEMENT

- 1.1 Brockwell Energy Limited, and all its subsidiaries, (the “Company”) believes in the sanctity of human rights and, in line with its desire to act ethically and with integrity during its business practices, has developed this policy on human rights. It sets out the Company’s policy and the steps that the Company is taking to identify, prevent, mitigate and account for how it addresses its impact on human rights and to avoid, identify, and remedy any human rights abuses taking place anywhere in its supply chains. The Company will seek to conduct its business, and encourage that the practices of its supply chain, follow the guidance contained within United Nations Guiding Principles (UNGPs) on Business and Human Rights United Nations Universal Declaration of Human Rights Human rights in the UNGPs refers to those internationally recognised rights understood at a minimum as the International Bill of Human Rights (comprised of the International Covenant on Economic, Social and Cultural Rights (1976), the International Covenant on Civil and Political Rights (1976) and the Universal Declaration of Human Rights (1948)) and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.
- 1.2 This policy reflects the Company’s commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to identify, prevent, mitigate and account for how it addresses its impact on human rights and to check that human rights abuses are not taking place anywhere in its supply chains.
- 1.3 The Company will, commensurate with the potential for human rights impacts, conduct human rights due diligence during the procurement of goods and services with any suppliers, contractors and business partners at the outset of our business relationship to identify, prevent, mitigate and account for how it addresses its impact on human rights. Where appropriate, the Company will covenant in the contracts for goods and services with suppliers, contractors, and the expectation that human rights will be respected in line with U.K law and international standards. Where appropriate and commensurate with the potential for human rights impacts, the Company will audit the policies of companies sub-contracting with the Company.
- 1.4 The Company will continue to review its policies and processes to avoid wherever possible non-compliance with both the legal and ethical standards required of a UK company of its size.
- 1.5 This policy does not form part of any employee’s contract of employment and it may be amended at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Company’s Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Chief Executive Officer has primary and day-to-day responsibility for requiring compliance with this policy and the Chief Financial Officer has responsibility for monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in identifying and mitigating the potential for human rights abuses in our business practices or in any of our supply chains.
- 2.3 All managers are responsible for ensuring those reporting to them understand and comply with this policy.

3. COMPLIANCE WITH THE POLICY

- 3.1 Employees must ensure that they read, understand and comply with this policy.

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- 3.2 The prevention, detection and reporting of human rights abuses in any part of our business or supply chains is the responsibility of all those working for us or under our control.
 - 3.3 Commensurate with the potential for human rights impacts, employees should conduct human rights due diligence during the procurement of goods and services with any suppliers, contractors and business partners at the outset of our business relationship to identify, prevent, mitigate and account for how it addresses its impact on human rights. Where appropriate, include a covenant in the contracts for goods and services with suppliers, contractors, which states that the expectation that human rights will be respected in line with U.K law and international standards.
 - 3.4 Employees must notify the Chief Financial Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
 - 3.5 If you are unsure about whether a particular act, the treatment of workers / stakeholders more generally, or their working conditions within any tier of our supply chains constitutes an impingement of their human rights, raise it with the Chief Financial Officer
 - 3.6 The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that human rights abuses of whatever form are or may be taking place in any part of our own business or in any of our supply chains.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risk our business faces from potential human rights abuses in its supply chains, forms part of the induction process for all individuals who work for us.
- 4.2 Our commitment to ensuring that human rights are respected in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 5.2 We will seek to remedy the consequences that arise from breaches of this policy, either directly or, where the breach has occurred through the actions of other individuals and organisations working on our behalf, we will instruct them to remedy the consequences – monitoring their compliance.
- 5.3 We may terminate our relationship with other individuals and organisations working on our behalf if they willingly disregard human rights and do not sufficiently remedy the impact / consequences of said disregard.