



Hanseatic
Energy
Hub

LNG TERMINAL PROJECT HUMAN RIGHTS POLICY

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Introduction

Hanseatic Energy Hub (HEH) is committed to upholding and respecting human rights in all our activities, operations, and value chain. From the development and management of our land-based LNG terminal, port, industrial park, and connecting infrastructure, to the construction and commissioning of the supra-infrastructure of a floating storage and regasification unit (FSRU), we recognize the significance of ensuring that the rights and well-being of all individuals, workers, communities, and other stakeholders are upheld. This Human Rights Policy outlines our commitment to operating in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines) and seeks to create a positive impact on the communities and environments in which we operate.

HEH adheres to all applicable international and national laws in the countries where we conduct business. In instances where local legislation differs from the principles outlined in the HEH Human Rights Policy, we follow the highest standard. Where it may contradict the principles outlined in the HEH Human Rights Policy, we will comply with the legal requirements while also actively seeking ways to uphold the international standards to the greatest extent possible.

1. Scope of the Policy

This policy reinforces our commitment to respect and uphold human rights across the entire project lifecycle. It applies to all aspects of HEH's operations, including planning, development, construction, operation, and maintenance of the land-based LNG terminal, and connecting infrastructure. It extends to the whole HEH. This includes all (managing) directors, employees, and individuals acting on behalf of HEH. The Human Rights Policy is part of the ESG Policy, Model & Plan of HEH. The principles of this Human Rights Policy are also embodied in HEH's Code of Conduct, applicable both to HEH employees and business relationships, our partners and suppliers. All HEH business relationships must ensure respect for all internationally recognized human rights, in alignment with this policy and the HEH Code of Conduct.

2. HEH's commitment

HEH is dedicated to upholding all internationally recognized human rights as outlined in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including ILO Core Conventions. In alignment with the UNGPs and the OECD Guidelines, we commit to establishing and implementing a due diligence process to proactively and systematically identify, prevent, mitigate, and account for any adverse human rights impacts. This includes ongoing annual assessments of potential risks to human rights covering own operations, contractors and business partners, responsible supply chain management (including on-site checks and audits), regular engagement with stakeholders, including local communities, operation of a grievance mechanism and remediation process, and the communication and continuous improvement of our practices based on lessons learned.

This Policy includes commitment to upholding human rights of all individuals who may be affected by our actions and the actions of our business partners. This includes HEH employees, employees of our subsidiaries, local communities in which we operate, and individuals and workers along our value chain. We place particular emphasis on addressing the rights and needs of vulnerable groups, including migrant workers and seafarers, and pay special attention to the following salient human rights issues, identified as key risks in our human rights impact assessment:

- We firmly prohibit forced labor, child labor, and human trafficking. Upholding labor rights is of utmost importance, encompassing health and safety standards, non-discrimination practices, equal treatment and opportunities for all, freedom of association, collective bargaining, fair wages, and reasonable working hours and work-life balance. All workers, especially migrant workers, must be provided with adequate housing and the right of residence where applicable.
- Respecting the right to privacy is integral to our values. We ensure our security practices uphold human rights and adhere to international standards, including safeguarding against surveillance and protecting data privacy.
- We are dedicated to safeguarding the lives, livelihoods, health, and rights of communities impacted by our operations and value chain. This encompasses their entitlement to clean water and environment, sanitation, land and natural resource ownership, and a safe and sustainable environment.
- Furthermore, we acknowledge the interplay between human rights and issues concerning unethical business conduct. Transparency and robust governance are our cornerstones, and we maintain a zero-tolerance approach towards bribery, corruption, money laundering, unfair competition, and irresponsible taxation. Our business operations adhere to the highest standards of responsibility in accordance with the OECD Guidelines.

Please see the HEH Code of Conduct for more details on the human rights expectations of our employees and business partners, particularly suppliers.

3. Grievance and Remediation

HEH is committed to addressing any adverse human rights impacts that the company has caused or contributed to. Internal and external stakeholders can raise grievances through an accessible and effective whistleblower system; the HEH Integrity Line: <https://hanseaticenergyhub.integrityline.com>

HEH will ensure that appropriate remedies are provided promptly, in a timely, effective, and transparent manner. In this regard, the grievance mechanism also serve as a course of identifying human rights risks.

We will work collaboratively with stakeholders to resolve issues, communicate the actions we are taking, learn from challenges, and continuously improve our practices to prevent any similar impacts from occurring in the future.

4. Governance

To ensure the effective implementation of this policy, the Head of ESG, is responsible for overseeing human rights assessments, managing risks, monitoring compliance, collecting any necessary information and recommending necessary actions. The Head of ESG, who is part of the Management Committee, reports directly to the Board. The Board approves all Due Diligence strategy and related policies, including this one, and is ultimately responsible for ensuring that human rights are respected across operations and value chain.

HEH will regularly assess and review the effectiveness of this policy and its associated measures, making adjustments as needed to align with evolving practices and standards.