

Harmony Energy Limited Group of Companies

Human Rights Policy

Approved and adopted by the Board of Directors of Harmony Energy Limited on 1 December 2025

Introduction

The Harmony Energy Group of Companies (“Harmony Energy”) develops, builds, owns and operates grid-scale battery energy storage systems (BESS) and renewable energy generation projects to help achieve a more environmentally, socially and economically sustainable future.

In delivering renewable energy infrastructure projects, we recognise that our activities, and those of our suppliers, impact on human rights. The ethical treatment of all people and regard for human rights are central to our mission of powering a sustainable future.

This Human Rights Policy (the “Policy”) sets out our commitment to zero tolerance of human rights abuses in all forms. This means we conduct our business in accordance with relevant laws and regulations, but also that we operate to the high standards we set for ourselves, outlined in this Policy.

Scope

This Policy applies to all majority-owned Harmony Energy Group companies, subsidiaries and SPVs, as well as suppliers from the date of adoption.

This Policy is embedded in our Supplier Code of Conduct, which all key suppliers are expected to adhere to.

Where Harmony Energy operates internationally, this Policy will be applied, subject to legal or regulatory requirements of the relevant international jurisdiction, and relevant local policies and supporting procedures.

Governance

The Board of Directors has ultimate responsibility for and oversight of this Policy.

Roles and responsibilities

This Policy applies to all colleagues across the Harmony Energy Group of Companies - both permanent and non-permanent workers, and anyone working on behalf of Harmony Energy.

- **The Board of Directors** has ultimate responsibility for setting Harmony Energy’s human rights approach, commitments and Policies.
- **The Sustainability Committee** oversees, monitors and reviews Harmony Energy’s human rights approach and performance and makes recommendations to the Board on human rights matters.
- **The Group Sustainability Team and Human Resources Teams** are responsible for integrating the Human Rights Policy and associated activities into key business areas and measuring, monitoring and reporting on human rights performance and incidents. The Group Sustainability Team advises the Board, the Sustainability Committee and business functions on human rights-related matters.

- **Teams and Business Units** are responsible for integrating the Human Rights Policy, approach and associated initiatives into their activities.
- **Managers** are responsible for making sure that their teams understand and comply with this Policy, supporting procedures as well as complete any relevant training.
- **All employees** must comply with the Policy and supporting procedures and complete all relevant training.

Policy principles

This Policy sets out our commitment to conduct our business in accordance with relevant laws and regulations, but also to operate to the high standards we set for ourselves through the following policy principles:

- **Forced labour, modern slavery and human trafficking**
We are committed to preventing and eliminating forced labour, modern slavery and human trafficking in all its forms in both our operations and supply chain. We respect the rights of all workers, and we are committed to ensuring that employment is always freely chosen.
- **Child labour and young workers**
We respect the rights of children and young workers, and we are committed to ensure that employment is always freely chosen. This includes preventing and eliminating instances of child labour in our operations and supply chain.
- **Equal opportunities and fair labour conditions**
We are committed to providing a fair and respectful work environment. We recognise the value of different backgrounds and perspectives in our workforce, and fully promote equal opportunity for all employees, both current and prospective. We do not discriminate based on any protected characteristic. We do not allow harassment or abusive behaviour, including bullying, harsh or inhumane treatment or physical disciplinary action.

We are committed to ensuring that people are paid a fair wage for the work they are doing with a reasonable work/life balance. Wages and other remuneration are paid in line with legislation. We ensure that working hours are not excessive and comply with local labour legislation in our own operations and our supply chain.

We respect the right of employees to join independent trade unions, form collective bargaining agreements and have freedom of association. We have the same expectations of suppliers, service providers and other business partners.

- **Health and safety**
In line with our Health and Safety Policy, Harmony Energy is committed to protecting the safety and wellbeing of our colleagues, contractors and the public through maintaining high health and safety standards across our operations. We implement robust health and safety procedures to avoid and minimise adverse health and safety impacts and where they do occur, they are promptly investigated and addressed, with appropriate mitigation measures put in place to help prevent similar incidents occurring in future. The same is required from all stakeholders in our supply chain through the Supplier Code of Conduct.
- **Engaging local communities and respecting land rights**
We carefully consider the local impact of our projects, and we are committed to sharing value with people who live and work nearby. We strive to engage with communities in a collaborative and open way to ensure that our communities are actively involved in the

decisions that impact them. We are committed to avoiding adverse impacts where possible and promoting positive impacts through our community engagement and investment initiatives.

We recognise that a significant proportion the world's natural resources are found on or near the lands of indigenous peoples and that our supply chain impacts those people directly. We are committed to engaging with suppliers to advance human rights standards and embedded those expectations in our Supplier Code of Conduct. For all raw material extraction and processing used in equipment on Harmony Energy's sites, we expect our suppliers to engage with legitimate representatives of indigenous communities and respect their right to grant or withhold free, prior, and informed consent for their operations.

- **Grievance and access to remedy**

Harmony Energy has established internal grievance mechanisms which employees can use to raise concerns or complaints, as well as a publicly accessible grievance mechanism via Harmony Energy's website for external stakeholders. We are committed to promptly investigating and addressing any concerns raised, including providing access to remedy, if an adverse human rights impact were to occur.

Harmony Energy does not tolerate retaliation in any form for good faith reporting or participation in investigations.

Reporting

Human rights performance will be reported to the Board quarterly and externally annually.

Review

Harmony Energy commits to reviewing the content of this Policy at least annually to ensure its effectiveness. Any revisions will be recommended to the Board for consideration and approval.

Supporting documents

- Supplier Code of Conduct
- Health and Safety Policy