



GLOBALWORTH – GROUP HUMAN RIGHTS POLICY

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1. Purpose and Scope

- 1.1 The purpose of this policy is to set out our commitment to our responsibilities to respect human rights.
- 1.2 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

2. Who does this policy apply to?

- 2.1 This policy applies globally to Globalworth, its subsidiaries and affiliated companies (as defined in the Companies Law) ("Globalworth Group"), as well as to all companies in which the Globalworth Group holds an interest, to the extent that such companies adopt this Policy as binding (hereinafter, all companies covered by the scope are referred to as "Globalworth"). This Policy applies to all employees at all levels and grades, including directors, senior managers, permanent, fixed-term, temporary employees and seconded employees to Globalworth from third parties (and **employee** (or **you**) in this policy shall be interpreted accordingly).
- 2.2 This policy is also communicated to all business partners and other relevant parties and, as part of our due diligence processes, we ask them to confirm that they conduct their own businesses by ensuring that human rights are respected throughout their business and supply chain.

3. Who is responsible for this policy?

- 3.1 The Board has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the General Counsel & Company Secretary. Suggestions for change should be reported to the General Counsel & Company Secretary.
- 3.2 The General Counsel & Company Secretary has day-to-day responsibility for this policy and you should refer any questions about this policy to her in the first instance.

4. Definitions

Board: means the board of directors of Globalworth Real Estate Investments Limited.

Chair: means the chair of the Board.

Companies Law: means The Companies (Guernsey) Law, 2008 (as amended).

General Counsel & Company Secretary: means the General Counsel & Company Secretary of Globalworth Real Estate Investments Limited.

Employee or **you:** has the meaning set out in the Purpose and Scope section above.

Globalworth or **we**: means Globalworth Real Estate Investments Limited and/or, where appropriate, any and all of its subsidiaries and/or affiliated entities.

ILO: International Labor Organization.

Subsidiary: means any company or other entity which is a subsidiary of Globalworth and the expression 'subsidiary' shall have the meaning given in the Companies Law (save that such expression shall also include an Overseas Company, as such term is defined in the Companies Law).

5. Statement of Commitment

5.1 We are fully committed to our responsibilities to respect human rights. Our commitment is aligned with the following international frameworks and standards:

- (a) UN Guiding Principles on Business and Human Rights;
- (b) OECD Guidelines for Multinational Enterprises;
- (c) ILO's Conventions on Fundamental Principles and Rights at Work; and
- (d) International Bill of Human Rights.

5.2 The UN Guiding Principles on Business and Human Rights set the baseline responsibility of all businesses as respect for human rights wherever they operate. Whilst the Guiding Principles and other international human rights treaties do not impose direct legal obligations on business enterprises, and legal liability and enforcement for the infringement by businesses of international human rights standards is defined largely by national law, we understand that businesses can and do infringe human rights where they are not paying sufficient attention to the risk and how to reduce it. We also understand that the responsibility of businesses to respect human rights, as reflected in domestic law and regulations corresponding to international human rights standards, is not optional; for example, health and safety, food safety and environmental legislation. The human rights requirement extends beyond legal compliance to a global standard of expected conduct applicable to all businesses.

5.3 This policy document therefore acknowledges our commitment to:

- (a) Avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur; and
- (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts.

5.4 To support the commitment outlined above, human rights considerations are integrated into Globalworth's wider social and environmental impact assessments and due diligence processes which helps us to identify, prevent, mitigate and account for how we address our impacts on human rights.

6. Child Labour

- 6.1 Child labour shall not be used. The minimum age for any person employed shall comply with internationally recognised standards such as the guidelines of UNICEF, and the ILO conventions, as well as national laws.
- 6.2 We expect all parties with whom we conduct business to prohibit and refrain from any kind of child labour and forced labour within their organisation.

7. Our Workforce

- 7.1 Respecting the human rights of our workforce, including labour rights, and operating in an ethical manner, are integral parts of our day-to-day business conduct. We ask that all employees are always guided by company values as well as the Company's Code of Conduct. This Policy also provides additional guidance to support a corporate culture characterised by respect and recognition of human rights.
- 7.2 All workers shall be treated fairly and with respect. We shall not tolerate any forms of discrimination or harassment including, but not limited to age, religion, sex, sexual orientation, political opinion, ethnicity, or disability.
- 7.3 We must ensure that no workers are subject to physical, sexual, or psychological harassment or other abusive, threatening, or inhumane behaviour. We shall provide workers access to grievance mechanisms.
- 7.4 We expect all parties with whom we conduct business to respect and comply with the fundamental rights granted to all employees under applicable laws and regulations.

8. Occupational Health and Safety

- 8.1 Workers shall receive relevant and documented health and safety training, and such training shall be repeated on a regular basis.
- 8.2 We expect all parties with whom we conduct business to fully comply with national laws governing health and safety at work. Moreover, they are expected to train their employees for the purpose of preventing accidents at work and occupational diseases as best as possible.
- 8.3 All Group companies operate under a Health and Safety management system (in Romania this is certified to the international ISO 45001 standard) and, across the Group, the system must cover all activities in which Globalworth has management control or a majority shareholding.

9. Reporting and Monitoring of Potential Violations

- 9.1 Globalworth has in place a whistleblowing policy and whistleblowing procedures. Should an employee become aware of any violations of internationally applicable human rights standards, or have a reasonable suspicion of such, the individual is requested to report this immediately to their manager or via the whistleblowing policy and procedures. Reporting a reasonable suspicion or violation shall not lead to consequences for the reporting person. For further details, please refer to the whistleblowing policy and procedures which can be found on the Company's website at www.globalworth.com/whistleblowing/.