

A background image showing several hands of different skin tones reaching out and holding onto a thick, textured tree trunk. The background is a lush green forest with sunlight filtering through the leaves.

ELSEWEDY
ELECTRIC

Human Rights Policy

“While our society has made significant progress safeguarding human rights over the past decade, violations remain a common issue, requiring a careful and diligent approach. We commit to protecting and cherishing human rights within our operations and across the supply chain in line with our Code of Conduct and the UN Guiding Principles on Business and Human Rights”

AUGUST 2022



Policy Introduction

Compliance and Action on Human Rights Violations

Throughout its history, Elsewedy Electric have maintained a corporate Human Rights commitment internally within its organization and procedures and externally through its different business partners, comprising among other, different agents, suppliers, consortium or JV partners, subcontractors, etc., that form part of its activities and that interact with the Group or its employees.

Through this Human Rights Policy, Elsewedy Electric aims to formalize what has always been part of its culture and assume its responsibility to respect human rights, both by formalizing a due diligence process to identify and prevent any impact of its activities on human rights, and implement a process that allows it to detect as early as possible any negative consequences on human rights which might be caused or contributed to by its activities or

that of its, future or current, business partners and to eliminate such negative consequences in its entirety.

This Policy is aligned with the Group's internal Policies for the development of the basic principles of action contained in Elsewedy Electric's Code of Conduct, thus establishing the Group's commitment to the ten principles of the UN Global Compact.

INTERNATIONAL REFERENCES:

In the definition of this Policy, Elsewedy Electric bases its approach on the:

- International Bill of Human Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and its two protocols
- International Covenant on Economic, Social and Cultural Rights.
- The eight core Conventions of the International Labour Organization (ILO)
- ILO Declaration on Fundamental Principles and Rights at Work,
- International Finance Corporation (IFC) Performance Standards
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

Elsewedy Electric is unequivocally committed to respecting the above declarations in all its procedures, activities and operations and is in constant efforts to update its policies and procedures to close any gaps that might contradict or undermine the above declarations.

With regard to the rights of indigenous communities, this policy is based on the United Nations Declaration on the Rights of Indigenous Peoples, IFC Performance Standard 7 and ILO Convention No. 169 on Indigenous and Tribal Peoples in Independent Countries.

In the interpretation of the above standards, Elsewedy Electric will follow the authorized criteria of special mechanisms of the Human Rights Council, including the Special Representative of the Secretary-General on the question of human rights and transnational corporations and other business enterprises (Ruggie report) and the bodies created under human rights treaties.



Purpose & Applicability

PURPOSE

This policy's objective is to define Elsewedy Electric's commitments toward Human Rights and to define the rules applicable to our daily operations.

The policy has been developed in accordance with Good International Industrial Practices (GIIP) and International Finance Corporation Performance Standards. This Policy is a minimum standard; where local legislations define higher standards, the Group shall comply with them.

APPLICABILITY

Elsewedy Electric's Human Rights Policy is directly applicable to all activities of the Group and all the subsidiaries and affiliated companies in which Elsewedy Electric has control of management, as well as all its directors, managers and employees.

Elsewedy Electric's Management Team shall employ all the means at its disposal to enforce the commitments contained in this Policy, ensuring that it is made public and is disseminated internally and externally and to ensure that it is reflected in the operational procedures and policies aimed at instilling commitment at the level of the entire Group.

- ☒ Factories
- ☒ Offices
- ☒ Engineering, Procurement & Construction Projects
- ☒ Infrastructure Investments

Geographical Locations:

Africa, America, Asia, Egypt, Europe, GCC, Oceania.

Policy Commitments

The basic principles for the action of Elsewedy Electric in relation to its stakeholders and the environment, as established in the Corporate Social Responsibility Policy, are based on complying with the national and international laws and regulations in force in the countries where it operates, as well as fulfilling the international commitments related to corporate social responsibility and respect for human rights voluntarily subscribed to by Elsewedy Electric.

1. Employees

All actions taken by Elsewedy Electric and its employees shall strictly abide by the human rights and civil liberties included in the Universal Declaration of Human Rights and specifically, the United Nations Ruggie Report on Human Rights and Companies. The relationship of the Group with its employees, as well as the relationship among employees will be based on the following commitments:

- **Equal opportunities:** Elsewedy Electric seeks a work environment in which all individuals are treated equally. Elsewedy Electric believes that everyone has the right to work in a professional atmosphere that promotes equal employment opportunity and prohibits discriminatory practices. Elsewedy Electric ensures fairness in all aspects of employment, including hiring, training, performance evaluation, administering compensation and benefits, and terminating employees. For further information, see [Diversity, Inclusion & Non-Discrimination Policy](#).
- **Diversity & Inclusion:** As a Group with a global presence, we will further advance our commitment to diversity, equity, disabilities and support of vulnerable groups within our company and beyond. We will also continue improving our zero-tolerance policy towards discrimination while offering fair salaries and benefits to all employees. We also recognize that social patterns. We commit to improving the gender balance in both the general workforce and executive positions, with over three fourth currently being male, making extra effort to reach out to and employ highly qualified women and support their career growth. For further information, see [Diversity, Inclusion & Non-Discrimination Policy](#).
- **Non-discrimination:** The Group managers must maintain an environment free from all forms of discrimination and from any behavior involving personal harassment. On this basis, Elsewedy Electric companies do not tolerate any kind of discrimination on the basis of race, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political or union opinions, region, or any other personal, physical or social condition. For further information, see [Diversity, Inclusion & Non-Discrimination Policy](#).
- **Anti-harassment:** Elsewedy Electric is committed to providing a safe environment for all its employees free from any harassment at work including sexual harassment. Elsewedy Electric shall operate a zero-tolerance policy for any form of harassment in the workplace, treat all incidents seriously, and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including termination of employment. All complaints of harassment will be taken seriously and treated with respect and confidence. Elsewedy Electric also prohibits retaliation for reporting, opposing harassment, or cooperating with an investigation of a harassment complaint. For further information, see [Anti- Harassment Policy](#).
- **Safety at work:** The Group is committed to providing its employees with a safe and stable environment and shall continually update its labor risk prevention measures as well as strictly abide by all applicable legislation, in all places where it carries out its corporate activities. For further information, see [Health, and Safety Policy](#).
- **Data privacy:** Elsewedy Electric is committed to protect the personal information of all individuals and to leverage data as an enterprise asset and mitigate risk of data breach, data losses or misuses, alteration and unauthorized access or destruction. Therefore, the group adopted an effective [Data Privacy Policy](#) to regulate the use of personal information Elsewedy has implemented reasonable technical and organizational security measures to protect all personal.



Policy Commitments (cont.1)

- **Freedom of association and collective bargaining:** The Group protects the right of its employees to form or take part in organizations aimed at defending and promoting their interests. Employees are expected to comply with the applicable laws that recognize the rights of employees to lawfully form and join labor organizations, to protect employees against anti-union discrimination, and to take measures to promote negotiations of employment conditions by labor unions.
- **Eradication of child labor:** Elsewedy Electric is adamant about prohibiting exploitation of children in all its activities including partners, contractors, suppliers, and vendors. Elsewedy Electric will not tolerate the use of children in any of its global operations and facilities, and prohibits the employment of males or females before the applicable legal age of employment. For further information, see [Child Labor Policy](#).
- **Eradication of forced labor:** Elsewedy Electric prohibits forced labor under any circumstances in all operating companies and subsidiaries directly or indirectly controlled by the Group. All employees shall have the right to enter into employment voluntarily and freely, without the threat of a penalty. The Group forbids the use of coercion, violence, the threat of penalties, or other intimidating practices like confiscation of personal documents or wage punishments. All terms and conditions of service should be specified in employment contracts for which the employees should provide informed consent. For further information, see [Forced Labor Policy](#).
- **Accommodating for disabilities:** Elsewedy Electric is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities promptly. For further information, see [Diversity & Inclusion Policy](#).
- **Retrenchment:** The Group will, to the best of its ability, provide continuity of employment to workers within the constraints of organizational and financial circumstances. Circumstances such as reduced workloads or funding may, however, necessitate terminations of employment. If retrenchment becomes necessary, the company will make it transparent to all workers. For further information, see [Retrenchment Policy](#).
- **Migrant workers:** Elsewedy Electric is committed to ensuring that migrant workers in our operations are treated with due respect for their human rights, in accordance with local laws and international best practices for migrant workers. For further information, see [Migrant Workers Policy](#).

2. Customers and Suppliers

Elsewedy Electric is committed to developing its activity based on the high professionalism of its employees and managers, allowing it to provide an efficient service adjusted to the needs of customers, focusing on excellence and quality of service. The Group also undertakes to maintain a relationship with its customers based on the principles of transparency, confidentiality and non-discrimination. For further information, see [Customer Grievance Redressal Policy](#).

The Group considers its suppliers, contractors, and external collaborators as indispensable in order to achieve its objectives for growth, profitability, and improvement in quality of service. For this reason, it seeks to establish relationships with them based on trust and mutual benefit. All Group employees who participate in selection processes for contractors, suppliers, and external collaborators are obliged to act impartially and objectively, applying financial and non-financial¹ criteria and avoiding any conflicts of their personal interests with those of the Group. The Group also promotes the dissemination and knowledge of the commitments it has adopted with regard to human rights among its contractors, sub-contractors, suppliers, and external collaborators, as well as their adherence to such commitments with measures such as the introduction of nonfinancial criteria in the approval of suppliers and subcontractors and the establishment of mechanisms to detect bad practices in these areas. For further information, see [Third Party Code of Conduct Policy](#).



Policy Commitments (cont.2)

3. Investment - Elsewedy Electric is committed to ensuring respect for human rights in the course of its investment projects, introducing specific measures for the management of any potential risks and impacts on human rights, and allocating the necessary resources for the implementation of corrective measures. For further information on our investment risk and impact assessment and mitigation, see [Environmental and Social Management System](#).

4. Environment - Protection of the environment and natural resources together with attempting to achieve sustainable economic development is of strategic importance to Elsewedy Electric, as a responsible approach towards the environment is crucial to the Group's resilience and competitiveness. It provides opportunities for addressing environmental challenges and extending Group contributions to sustainability. The Group has the responsibility of preventing negative impacts on the environment, improving the environmental sustainability of products and services, creating value for the Group and its different stakeholders, as well as complying with legal obligations and voluntary commitments. For further information, see [Environmental Policy](#), [Climate Policy](#), [Water Policy](#) and [Biodiversity Policy](#).

5. Community

Elsewedy Electric is committed to ensuring greater respect for human rights in the communities in which it operates. The relationship of the Group with the communities in which it operates will be based on the following commitments:

- **Resettlement and livelihood restoration:** Elsewedy Electric will avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs. Elsewedy Electric shall also carry out measures to avoid forced eviction and to anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected. Elsewedy Electric aims to improve, or restore, the livelihoods and standards of living of displaced persons and to improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites. For further information, see [Resettlement and Livelihood Restoration Policy](#).
- **Respect for indigenous peoples:** Elsewedy Electric aims to ensure that our development projects foster full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods of Indigenous Peoples. Elsewedy Electric shall carry out measures to anticipate and avoid adverse impacts of projects on communities of Indigenous Peoples, or when avoidance is not possible, to minimize and/or compensate for such impacts. Elsewedy Electric also aims to promote sustainable development benefits and opportunities for Indigenous Peoples in a culturally appropriate manner and to establish and maintain an ongoing relationship based on Informed Consultation and Participation (ICP) with the Indigenous Peoples affected by a project throughout the project's life-cycle. Elsewedy Electric committed to respecting and preserving the culture, knowledge, and practices of Indigenous Peoples and ensuring the Free, Prior, and Informed Consent (FPIC) of the Affected Communities of Indigenous Peoples. For further information, see [Indigenous Peoples Policy](#).
- **Protection of cultural heritage:** Elsewedy Electric aims to protect cultural heritage from any potential negative impacts that might arise as a result of project activities and to support its preservation. Elsewedy Electric also aims to promote the equitable sharing of benefits from the use of cultural heritage. In addition to complying with applicable national laws on the protection of cultural heritage, Elsewedy Electric shall identify and protect cultural heritage by ensuring that internationally recognized practices for the protection, field-based study, and documentation of cultural heritage are implemented. Where the risk and identification process determines that there is a chance of impacts to cultural heritage, Elsewedy Electric will retain competent professionals to assist in the identification and protection of cultural heritage. For further information, see [Cultural Heritage Policy](#).



MONITORING & REPORTING

The various Group's companies, in collaboration with the Compliance Department and Internal Audit Department, shall be responsible for carrying out due diligence processes in the course of their activities, analysing the indicators and information that will enable them to understand and assess the risks in the field of human rights and non-financial risks (e.g. social, environmental, political and reputational risks, etc.), as well as the adoption of the necessary measures to prevent and mitigate these risks.

In this aspect, Elsewedy Electric will promote the establishment of mechanisms and procedures to minimize the risk of bad practices related to human rights among the companies of the group, including:

- Developing training initiatives in the field of ethics, integrity and human rights among its employees.
- Promoting and encouraging its suppliers, contractors and partners to formalize their commitment to human rights and, if they do not have their own policy in the matter, urging them to follow Elsewedy Electric's policies, including for such purposes specific clauses for the respect of human rights in contracts and agreements, especially in those areas where the Group understands that this risk is higher.
- Promote the implementation of non-financial criteria in the approval of suppliers and the assessment and establishment of mechanisms for detecting bad practices in these areas.
- Promote the dissemination, knowledge of and compliance with the Human Rights Policy, Elsewedy Electric Code of Conduct, and all other Group Policies in each and every Group company.
- Establishing the appropriate communications channels to ensure that any employee can seek or provide information regarding compliance with the Human Rights Policy, Elsewedy Electric Code of Conduct, and all other Group Policies, ensuring the confidentiality of complaints processed at all times.
- Interpreting the regulations derived from the Human Rights Policy, Elsewedy Electric Code of Conduct, and all other Group Policies and supervising their implementation.
- Ensuring the accuracy and fairness of any proceedings commenced, as well as the rights of persons allegedly involved in possible breaches.

DISCIPLINE, GRIEVANCE & REMEDIATION

Violations of this policy may lead to disciplinary action up to, and including, termination of employment or partnership. The disciplinary process shall be undertaken in accordance with all applicable local laws and other legal requirements.

The Group alert escalation process must be followed by any employee who has identified or has been made aware of a potential violation of this Policy. All employees are welcome to promote and enhance this Policy to other employees and stakeholders.

POLICY REVIEW

This policy shall be reviewed annually and/or when deemed necessary.

VERSION CONTROL

TITLE OF DOCUMENT	Group Human Rights Policy
VERSION NO.	2
CONFIDENTIALITY STATUS	Public
DOCUMENT OWNER	Chief Sustainability Officer
DOCUMENT REVIEWER	1. Chief Human Resources Officer 2. Chief Finance Officer
DOCUMENT APPROVER	Chief Executive Officer
DATE OF CREATION	August 2022
COMMUNICATION & TRAININGS	Policy shall be circulated to internal and external stakeholders. Trainings shall be carried out to ensure the Policy is understood by all Group employees.
DATE OF NEXT REVIEW	