
Human Rights Policy

Pharos Energy plc and its subsidiaries (together **the Group**) conduct the Group's business in accordance with the fundamental principles of Human Rights enshrined in the Universal Declaration of Human Rights. This Human Rights Policy (**this Policy**) applies to all of the Group's operations worldwide and reflects the provisions of Chapter IV of the 2011 OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We respect the protection of human rights across our internal and external business environment, encompassing our workers and employees, our supply chain, affected communities and diverse other stakeholders. We uphold the internationally accepted labour standards of the International Labour Organisation (**ILO**) and are guided by the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (5th edition 2017). We are committed to complying with human rights laws across our operations including, to the extent applicable, the UK Human Rights Act 1998 and the European Convention on Human Rights.

We are committed to protecting the Group's employees, avoiding negative impacts on affected communities and ensuring we are not complicit in any human rights abuses. We employ a range of processes to identify and address human rights issues and have integrated human rights into our governance and business management systems as follows:

- We make our agents, contractors and suppliers aware of this Policy and applicable supplier and counterparty standards, and seek to ensure their compliance therewith.
- We make every effort to ensure that our JV partners respect this Policy and related standards.
- We ensure our communications with government are consistent with this Policy.
- We maintain the security of our operations within a framework that ensures respect for human rights and have adopted the Voluntary Principles on Security and Human Rights (available at <https://www.voluntaryprinciples.org/the-principles/>), implemented through the Group's Security Policy and supporting procedures.
- The fundamental rights of our workers are paramount, and we strive to provide a safe and healthy place of work, based on the principle of equal opportunity and fair treatment.
- Human rights are an integral part of our staff and contractor training and our workers are given clear documentation regarding their rights under national labour and employment laws. We implement measures to prevent and address religious, gender or other forms of harassment, intimidation and exploitation.
- We are committed to providing a workplace that is inclusive, free from discrimination, and where our employees, contractors and suppliers can work in dignity and full enjoyment of their legitimate rights.

- We remain respectful and accepting in our relationships with current and future employees without discrimination or prejudice on grounds of age, disability, gender, neurodiversity, marital status, sexual orientation, colour, race, religion or any other characteristic protected by applicable laws.
- We respect the indigenous rights and cultures of the communities within our host countries as defined by ILO Convention 169 on Indigenous and Tribal Peoples.
- We recognize the importance of engaging with stakeholders and local communities and set up effective and transparent social engagement programmes in all our areas of operation.
- We have developed grievance management procedures, including extensive whistleblower protections, and take appropriate steps to avoid, minimise and/or mitigate any negative impacts from our activities. Our grievance management procedures provide not just for the reporting of grievances raised but also actions taken to address them.
- We include human rights as part of integrated environmental and social impact assessments undertaken for material operational activities.
- We identify, assess and manage human rights risks within our sphere of influence and conduct human rights due diligence as part of our corporate processes, including prior to new projects and investments, in accordance with our new entry procedures.

These will be our guiding principles in all our endeavours. This Policy applies to all Group operations and personnel worldwide.



Katherine Roe
Chief Executive Officer
18 March 2026