

Human Rights Policy

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Approved by	Roger Boeing, Managing Director
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1. Purpose and Scope

This Human Rights Policy describes the commitment of Gelsenkraft GmbH (“Gelsenkraft” or “the Company”) to respect and uphold internationally recognised human rights across all of our business activities and relationships.

It applies to all directors, employees and staff, and sets out the expectations we place on our suppliers, contractors and business partners.

2. Our Commitment

We are committed to respecting human rights in line with internationally recognised standards, including:

- The Universal Declaration of Human Rights;
- The UN Guiding Principles on Business and Human Rights;
- The core labour standards of the International Labour Organization (ILO);
- The ten principles of the UN Global Compact; and
- Applicable national legislation, including the German Supply Chain Due Diligence Act (LkSG) where relevant, and forthcoming EU due-diligence requirements (CSDDD).

3. Non-Discrimination and Equal Opportunity

We treat all individuals with respect and provide equal opportunity. We do not tolerate discrimination on the basis of ethnicity, national origin, gender, age, religion, disability, sexual orientation, political opinion, or any other protected characteristic.

4. Prohibition of Child Labour

We do not employ children below the applicable legal minimum working age and do not tolerate child labour in our operations or supply chain, in line with ILO Conventions No. 138 and No. 182.

5. Prohibition of Forced Labour and Modern Slavery

We prohibit all forms of forced, bonded, compulsory or trafficked labour and any form of modern slavery. Employment is freely chosen, and employees are free to leave their employment in accordance with applicable notice requirements.

6. Freedom of Association

We respect employees' rights to freedom of association and collective bargaining in accordance with applicable law, and we do not disadvantage employees for the lawful exercise of these rights.

7. Fair Working Conditions

We provide fair remuneration that meets or exceeds applicable legal minimums, and we comply with applicable laws on working hours and rest periods. We aim to offer secure and predictable employment conditions.

8. Health and Safety

We provide a safe and healthy working environment, identify and mitigate workplace risks, and comply with applicable occupational health and safety law. We aim to continuously improve our health and safety practices.

9. Harassment-Free Workplace

We do not tolerate harassment, bullying, intimidation or abuse of any kind. We are committed to maintaining a respectful workplace in which everyone feels safe.

10. Supply Chain and Business Partners

We expect our suppliers, contractors and business partners to uphold the same human-rights principles set out in this Policy. We seek to work with partners who share our commitment to responsible business, and we are prepared to address situations where these expectations are not met.

11. Human Rights Due Diligence

Proportionate to our size and risk profile, Gelsenkraft seeks to identify, prevent and mitigate adverse human-rights impacts connected to our operations and value chain. Where we identify that we have caused or contributed to an adverse impact, we are committed to providing for or cooperating in its remediation.

12. Reporting and Grievance Mechanism

Employees, partners and other stakeholders can raise human-rights concerns in good faith to management or via info@gelsenkraft.com. Concerns are handled confidentially as far as reasonably possible, and we do not tolerate retaliation against anyone who raises a concern in good faith.

13. Governance and Review

The management of Gelsenkraft is accountable for this Policy and for embedding respect for human rights into our business. This Policy is reviewed at least annually and updated to reflect changes in our operations, applicable law and stakeholder expectations.