PRONEXIUM ENERGY

HUMAN RIGHTS POLICY

Respecting dignity, fair work and internationally recognized human rights

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Policy Owner	Human Resources/ QHSE	Appoval	Managing Director
Effective Date	09/08/2026	Review Cycle	Annual
Classification	Company-wide	Status	Approved

1. Policy Statement

Pronexium Energy is committed to respecting and supporting internationally recognized human rights throughout our operations, workplaces, projects, business relationships and supply chain. We conduct business with integrity and respect for the dignity, safety, equality and fundamental freedoms of every person affected by our activities.

No commercial objective, operational pressure, schedule requirement or contractual commitment justifies conduct that violates human rights. Pronexium Energy expects employees, contractors, subcontractors, suppliers, labour providers, agents and other business partners to uphold equivalent standards and to act promptly when concerns are identified.

2. Purpose

This Policy establishes Pronexium Energy's human-rights commitments, minimum behavioural standards, governance responsibilities and due-diligence expectations. It is

intended to prevent, identify, mitigate, report, investigate and remedy adverse human-rights impacts connected with our activities and business relationships.

3. Scope

This Policy applies to all directors, officers, employees, temporary and agency personnel, contractors and project workers of Pronexium Energy, whether working onshore, offshore, at client sites, in offices, workshops, warehouses, accommodation facilities or logistics locations. It also sets expectations for suppliers, subcontractors, recruitment agencies, labour brokers, consultants and other parties working for or on behalf of the Company.

4. Guiding Principles

Pronexium Energy's approach is informed by applicable Angolan law and internationally recognized human-rights principles, including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Declaration on Fundamental Principles

and Rights at Work. Where legal or contractual requirements differ, Pronexium Energy will comply with applicable law and seek to respect internationally recognized human rights to the greatest extent reasonably possible.

5. Our Human Rights Commitments

- Respect the dignity, privacy, safety and lawful rights of every person with whom we work or interact.
- Provide a workplace free from violence, intimidation, bullying, harassment, exploitation and degrading treatment.
- Prohibit forced labour, bonded labour, servitude, human trafficking and all other forms of modern slavery.
- Prohibit child labour and perform appropriate age and right-to-work verification before engagement.
- Promote equal opportunity and prohibit unlawful discrimination in recruitment, assignment, remuneration, training, promotion and other employment decisions.
- Provide fair, lawful and transparent employment terms, wages, benefits, working hours, rest periods and deductions.
- Respect lawful freedom of association and collective representation, without intimidation or retaliation.

- Protect the health, safety and wellbeing of employees, contractors and others who may be affected by our work.
- Maintain reporting channels and prohibit retaliation against persons who raise genuine concerns in good faith.
- Use risk-based due diligence and corrective action to address human-rights risks in our operations and supply chain.

6. Forced Labour, Modern Slavery and Human Trafficking All work must be freely chosen. Pronexium Energy prohibits forced or compulsory labour, debt bondage, servitude, trafficking, coercive recruitment, restriction of movement, withholding of wages as a means of control and retention of passports or identity documents as a condition of employment. Workers must be free to leave employment in accordance with applicable law and agreed employment terms.

Workers must not be charged improper recruitment fees, deposits or other prohibited costs to obtain or retain employment with Pronexium Energy. Suspected exploitation or trafficking must be reported immediately and handled with priority for the safety, rights and welfare of potentially affected persons.

7. Child Labour and Young Workers

Pronexium Energy does not tolerate child labour. Human Resources and relevant labour providers must verify age and legal authorization to work before engagement. Young workers who may lawfully work must not be assigned activities that are prohibited by law or that may jeopardize their health, safety, education or development.

8. Equality, Diversity and Non-Discrimination

Pronexium Energy is committed to fair and merit-based employment practices. Employment decisions are based on legitimate business requirements, competence, qualifications, experience, conduct and performance.

Unlawful discrimination, harassment or adverse treatment based on characteristics protected by applicable law is prohibited.

9. Harassment, Violence and Respectful Conduct

Physical or verbal abuse, threats, intimidation, bullying, sexual harassment, coercion, humiliating treatment and workplace violence are prohibited. Managers are expected to model respectful conduct, respond promptly to concerns and prevent retaliation against persons who report misconduct or participate in an investigation.

10. Health, Safety and Wellbeing

Pronexium Energy regards safe and healthy working conditions as a fundamental responsibility. The Company applies its occupational health and safety management arrangements to identify hazards, assess risks, establish controls, provide appropriate information and training, supply suitable personal protective equipment where required, investigate incidents and continually improve performance.

Every employee and contractor has the authority and responsibility to stop or refuse work that presents an imminent and uncontrolled risk, subject to applicable site rules and escalation requirements. No person may be penalized for raising a genuine safety concern in good faith.

11. Fair Employment, Wages and Working Time

Employment terms, wages, benefits, working hours, overtime, rest periods, leave and lawful deductions must be transparent and administered in accordance with applicable law and contractual requirements. Written employment conditions should be communicated in a form and language reasonably understood by the worker before mobilisation or commencement of work.

Pronexium Energy prohibits wage withholding as punishment or coercion and expects payroll records and deductions to be accurate, traceable and subject to appropriate HR and Finance controls.

12. Freedom of Association and Worker Voice

Pronexium Energy respects employees' lawful rights to freedom of association, collective representation and worker participation. Employees must be able to raise workplace concerns, make suggestions and engage in lawful representation without intimidation, discrimination or retaliation.

13. Security, Communities and Stakeholders

Where security services are used to protect personnel, facilities or assets, security activities must be lawful, proportionate and respectful of human dignity. Unnecessary or excessive force, abusive treatment and discriminatory security practices are prohibited.

Pronexium Energy seeks to understand and responsibly manage material social, health, safety and environmental impacts on communities and other stakeholders affected by its activities. Where concerns arise, the Company will engage through appropriate channels and seek practical measures to prevent or reduce adverse impacts.

14. Suppliers, Contractors and Business Partners

Pronexium Energy expects suppliers, contractors, subcontractors, labour providers and other business partners to respect human rights and maintain standards consistent with this Policy. Relevant third parties are expected to:

- Comply with applicable labour, employment, health and safety and human-rights laws;
- Prohibit forced labour, human trafficking, bonded labour, child labour, harassment and abuse;
- Provide lawful wages, working hours and employment conditions;
- Maintain safe and healthy workplaces and provide appropriate worker training and protection;
- Maintain accurate employment, wage and right-to-work records;
- Provide appropriate channels for workers to raise concerns without retaliation;
- Permit reasonable compliance enquiries, document reviews or audits when contractually or legally appropriate; and
- Address identified non-conformities through timely corrective action and apply equivalent expectations to their own relevant subcontractors and labour providers.

Pronexium Energy may require corrective action, suspend work, withhold new awards or terminate a business relationship when serious or repeated human-rights violations are identified, subject to contractual rights, applicable law and consideration of potential impacts on affected workers.

15. Human Rights Due Diligence

Pronexium Energy applies proportionate, risk-based human-rights due diligence within relevant operational and supply-chain processes. Depending on the nature and level of risk, this may include supplier screening. contractual requirements, labour-provider checks, project risk assessment, worker interviews, document review, site verification, corrective-action plans and management escalation.

Enhanced attention may be applied where risk is increased by labour-intensive activity, cross-border recruitment, migrant labour, use of intermediaries, remote or offshore work, worker accommodation, security arrangements, high-risk jurisdictions or limited supply-chain visibility.

16. Reporting, Grievances and Non-Retaliation

Employees and third parties are encouraged to report actual or suspected human-rights violations, unethical conduct or breaches of this Policy as soon as possible. Concerns may be raised through:

- The employee's supervisor, project manager or other line-management representative;
- Human Resources;
- The QHSE Manager or QHSE representative;
- Procurement or Supply Chain management for supplier-related concerns;
- Senior management; or
- The Company's official email or other confidential reporting channel communicated at the workplace.

Reports will be handled seriously and, where appropriate, confidentially. Anonymous concerns may be considered where sufficient information is available. Retaliation, victimisation or disadvantage against anyone who raises a genuine concern in good faith or assists an investigation is prohibited.

17. Investigation, Corrective Action and Remediation

When a credible human-rights concern is identified, Pronexium Energy will take action appropriate to the circumstances. This may include:

- Protecting affected persons and preserving relevant evidence and confidentiality;
- Assessing the concern promptly and appointing an impartial person or team to investigate;
- Escalating significant risks to senior management and, where required, to the client or competent authorities;
- Implementing corrective, disciplinary or contractual action proportionate to the findings;
- Seeking appropriate remedy where Pronexium Energy has caused or contributed to an adverse impact; and
- Documenting actions, verifying closure and monitoring effectiveness to prevent recurrence.

18. Training, Awareness and Responsibilities

- Relevant personnel will receive awareness or training appropriate to their responsibilities and identified risks.
- Human Resources, QHSE, Procurement, project management, supervisors and personnel involved in recruitment, mobilisation, supplier oversight or investigations have enhanced responsibilities for implementing this Policy

Role	Responsibility
Managing	Approves the Policy, provides leadership, allocates resources and oversees material human-rights risks and responses

Human Resources	Applies fair recruitment and employment controls, supports worker grievances, maintains relevant records and prevents retaliation.
QHSE	Supports risk assessment, worker protection, awareness, investigation, corrective-action monitoring and integration with HSE management systems.
Procurement and Supply Chain	Communicates supplier requirements, performs proportionate screening and due diligence, and addresses supplier non-compliance
Project and Line Management	Implements this Policy at project and workplace level, maintains respectful conduct and escalates identified risks.
Employees and contractors	Comply with this Policy, respect others, participate in required training and report suspected violations in good faith
Suppliers and Busisness Partners	Respect equivalent human-rights standards, cooperate with reasonable due diligence and implement corrective action where required

19. Governance, Records and Review

Appropriate records of due diligence, training, complaints, investigations, supplier reviews and corrective actions will be retained in accordance with applicable legal, contractual and document-control requirements.

Material human-rights risks and recurring issues may be considered through management review and relevant QHSE, HR, procurement or project-governance processes.

This Policy will be reviewed at least annually and earlier where there is a material change in legislation, business activity, risk exposure, client requirements or recognized good practice. Revisions require authorised review and approval before issue.

20. Breaches and Consequences

Breaches of this Policy may result in disciplinary action up to and including termination of employment, removal from a project, supplier corrective action, suspension or termination of a commercial relationship, recovery of losses and referral to competent authorities where legally required or otherwise appropriate.

Failure to report a known serious violation may itself constitute misconduct.

21. Approval

PRONEXIUM ENERGY

This Policy is approved by the Managing Director and is effective from 09/08/2026. The Policy shall be communicated internally and may be made available externally to clients, suppliers and other stakeholders as evidence of Pronexium Energy human-rights commitment.

Approvrd by	Hélder Baba
Title	Managing Director
Signature and company stamp	
Approval date	09/01/2026

