

Solway Group Policy

Human Rights

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Short description

This policy defines the key commitments and requirements, and principal processes for the protection and respect of human rights with the Solway Group.

Approved by the S USC		Date 31.12.2025	Resolution #
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1 Purpose

This Policy sets out Solway's public commitment to respecting internationally recognized human rights and establishes the governance framework for its implementation. It applies to our organization and subsidiaries and defines expectations for business partners directly linked to our operations, products, or services.

2 Objectives

This policy aims to ensure that relevant human rights standards and practices are consistently, transparently, and effectively integrated into our strategy, operations, and value chain. It establishes ongoing human rights due diligence, stakeholder engagement, and access to remedy as part of our responsible business practices.

3 Scope

This Policy applies to directors, officers and employees of Solway Investment Group and its Subsidiaries.

For third parties, such as contractors, suppliers, security providers, agents, and other business partners across our value chain, we will use our influence to promote and help ensure alignment with the commitments set out in this Policy.

Where the Group or a Subsidiary has ownership and management responsibility less than fifty percent (e.g. joint ventures and other non-controlled relationships), Solway will use its influence to encourage adoption of these Policy requirements.

4 Additional applicable documents

- Solway Group Code of Conduct
- Solway Group Sustainability Policy
- Solway Group Sustainability Management Standards
- Solway Group Grievance Mechanism

5 Our commitments

At Solway, we are committed to respecting and promoting human rights across our operations and value chain, upholding international standards, and preventing human rights infringements. We strive to create and share sustainable value with communities, employees, and stakeholders.

We commit to:

- Operating in a manner that is consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Complying with applicable national laws and regulations and respecting internationally recognized human rights throughout our operations. Where our own standards exceed local requirements, we adhere to our higher standard. In situations where national law conflicts with human rights standards, we will comply with the law but seek ways to honor the principles of internationally recognized human rights in line with the UNGPs.
- Fostering a culture of respect for human rights and adopting and applying an open and transparent engagement and consultation process that ensures the meaningful participation of affected stakeholders.
- Recognizing Indigenous communities as key stakeholders and involving them in decision-making processes that affect them, ensuring their perspectives and concerns are integral to project planning and execution.
- Respecting the rights of Indigenous Peoples in line with the UN Declaration on the Rights of Indigenous Peoples, including honoring their right to Free, Prior, and Informed Consent (FPIC) for activities that may significantly impact their lands, territories, or resources.
- Maintaining a work environment free from any form of discrimination, harassment, or physical violence, and not tolerating prejudice or abusive behavior on any basis (such as race, gender, religion, ethnicity, etc.) towards our employees or stakeholders.
- Ensuring fair wages, safe working conditions, and the right to collective bargaining for all employees.
- Prohibiting all forms of child, forced or compulsory labor in our operations and value chain.

- Recognizing the vital role of human rights, land, environmental, and labor rights defenders and committing to their safety and rights to expression, association, and peaceful protest. We do not tolerate threats, intimidation, harassment, or legal retaliation against those who raise concerns in good faith and expect the same commitment from our employees, contractors, and partners.
- Maintaining security arrangements that respect human rights, in line with the Voluntary Principles on Security and Human Rights (VPSH), including ensuring that our operational security measures are conducted by trained personnel and collaborating with public and private security forces to uphold human rights standards at any time.
- Controlling and minimizing environmental impacts to protect the health and livelihoods of local communities, and implementing sustainable practices to safeguard natural resources for future generations.

6 Procedures

In our operations, we apply principles and procedures to identify, manage, and mitigate human rights risks and impacts, and to provide or support remedy where needed. This is done in line with the UNGPs to ensure respect for human rights across our operations and supply chain.

6.1 Engagement, information and capacity building

To understand the context and effectively engage with affected stakeholders, we

- Foster a culture of human rights respect across our organization and value chain, prioritizing early, meaningful, and ongoing dialogue with those affected by our operations.
- Raise awareness for our programs and actions and aim to enhance a shared understanding of human rights in the regions where we operate.
- Develop or participate in knowledge-sharing and capacity building initiatives for employees, contractors, suppliers and other stakeholders.

6.2 Risk assessment

To effectively identify, understand and manage human rights related risks, we

- Assess actual and potential human rights related risks and impacts in our operations and supply chains, integrating and acting upon the findings.
- Carry out Human Rights Impact Assessments in all our operations, and in conflict and high-risk areas (CAHRA) on an annual basis, in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Monitor the effectiveness of our procedures, and communicate how actual and potential impacts and risks are addressed.
- Integrate the findings into our risk framework, due diligence approach and business decision-making processes.

6.3 Due Diligence

The due diligence process is aligned with the requirements of the UN Guiding Principles on Business and Human Rights, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We

- Engage with potentially affected stakeholders and rights holders to continuously enhance our understanding of potential impacts of our operations.
- Conduct risk based human rights due diligence in our operations and supply chains to identify, and seek to prevent, mitigate, and account for how we address adverse human rights impacts.
- Integrate findings from our due diligence into our risk framework, and monitor and evaluate the effectiveness of our approach.

6.4 Grievance mechanism

Solway is committed to providing clear, accessible channels for individuals and communities to raise concerns. Effective grievance mechanisms help us address human rights impacts early, ensuring accountability, transparency, and trust. We

- Provide accessible and effective reporting lines and grievance mechanisms for affected rights holders, stakeholders, and others (referred to collectively as 'stakeholders') to raise, and seek resolution or remedy for, complaints and grievances (referred to collectively as 'grievances') related to Solway, its subsidiaries, and its business partners.
- Seek to ensure all grievances are addressed promptly and fairly, in line with the principles laid out in the UNGPs. This process includes receipt and acknowledgement of a grievance, fact finding and investigations, appeal options, resolution, response and feedback, and close out.
- Encourage everyone to speak up about potential or actual human rights issues and strictly prohibits any form of retaliation, reprisal, or intimidation against those who raise concerns or cooperate in inquiries, regardless of the outcome.
- Will protect whistleblowers and complainants from adverse actions, threats, harassment, or legal retaliation. Knowingly false or malicious reports may be addressed through disciplinary processes.

6.5 Business Relationships

The decision to end a business relationship can be a critical measure taken within our due diligence framework to ensure we are not causing or contributing to adverse human rights impacts, or are directly linked to such impacts.

Where we have reasonable grounds to believe that a business partner is involved in human rights abuses or supporting non-state armed groups, we will reconsider or discontinue the engagement.

6.6 Remediation

Solway is committed to providing effective and rights-compatible remediation for any human rights harm we cause or contribute to, ensuring accountability and support for affected individuals, in accordance with applicable laws and internationally recognized human rights standards.

- We aim to provide or to cooperate in providing remedies for adverse human rights impacts, and we will continue to work with stakeholders to identify ways to communicate how complaints or grievances have been addressed and integrated back into our due diligence process.
- Whilst all efforts will be made to resolve grievances amicably, if a grievance cannot be resolved, we will seek to involve external experts, neutral parties, traditional councils, or local and regional authorities to help resolve the issue.
- Complainants may still pursue administrative, judicial, or other remedies; all outcomes will align with international human rights standards.
- We will track the effectiveness of remedies and review grievance outcomes, ensuring lessons are integrated into our approach and shared with affected rights-holders.

7 Reporting and Monitoring

Solway continuously reviews and assesses our practices and will update our human rights policy and practices, on a regular basis and as and when necessary, and to reflect evolving standards and stakeholder expectations.

We will communicate transparently about our human rights efforts, impacts, and performance, and report regularly on human rights performance through our reports and disclosures.

We commit to continuous improvement in our approach to human rights and will monitor the effectiveness of the procedures related to our human rights commitments.

8 Definitions

Term	Definition
Human Rights	Human rights are the fundamental freedoms and protections inherent to all people, as defined in international standards such as the Universal Declaration of Human Rights and core UN and ILO conventions.
Human Rights Impact, adverse	When an action removes or reduces the ability of an individual to enjoy their human rights.
Grievance	A perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities. For the purposes of this Policy, the words grievances and complaints will be used interchangeably.
Grievance mechanisms	Any routinized, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought.
Due Diligence	A due diligence is the process by which a company identifies, assesses, prevents, mitigates, and addresses actual or potential adverse impacts on people and the environment across its operations and value chain.
Remediation	Remediation and remedy refer to both the process of addressing adverse impacts and the outcomes that can counteract, or make good, the adverse impact. Remedies may include apologies, restitution, rehabilitation, financial or non-financial compensation, punitive sanctions (criminal or administrative), and measures to prevent further harm, such as injunctions or guarantees of non-repetition.

9 Amendment History

Date	Version	Revised Content
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31.12.2025	2.1	Revised and approved