



OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

COMPANY'S POLICIES AND MANAGEMENT COMMITMENT HUMAN RIGHTS POLICY

Human Rights Policy

ALPHA GAS S.A. is committed to safeguarding welfare and human rights and commits to:

1. *Conduct its business consistently with the United Nations (UN) Guiding Principles on Business and Human Rights, the 10 principles of the UN Global Compact, the International Bill of Human Rights, ILO Declaration on Fundamentals Principles and Rights at Work, the regional applicable laws and MLC.*
2. *Provide a safe, physically and mentally healthy, psychologically safe and secure environment for all personnel.*
3. *Encourage reporting of relevant grievances through its Open Reporting Policy.*
4. *Support open communications onshore and onboard and improve morale and working relationships for all.*
5. *Protect the rights of its personnel during criminal investigations following accidents, including their rights to avoid self-incrimination, fair treatment and payment of wages, subsistence, accommodation and medical care.*
6. *Prohibit any fees or other charges for seafarer recruitment or placement or for providing employment to seafarers to be borne directly or indirectly, in whole or in part, by the seafarer, other than the cost of the seafarer obtaining a national statutory medical certificate, the national seafarer's book and a passport or other similar personal travel documents, not including, however, the cost of visas, which are borne by the Company.*
7. *Respect the principles of freedom of association and collective bargaining and is aligned with the International Labor Organization and its core conventions: No. 87, the Freedom of Association and Protection of the Right to Organize Convention, and No. 98, the Right to Organize and Collective Bargaining Convention.*
8. *Respect the rights of seafarers and only conduct tests on seafarers (including D&A tests) if this is permitted under the applicable law and subject to the consent of the seafarer. Where such consent is not provided, a stand-down procedure or termination of employment may be taken as disciplinary action, but no testing shall be conducted.*
9. *Verify that seafarers are:*
 - a. *Not subject to fraud, substitution of contracts or retention of passports.*
 - b. *Not charged any costs that are prohibited by the MLC, such as repatriation costs, etc.*
 - c. *Free to join a workers' union of their choice.*
 - d. *Informed about the confidential grievance channels that can be used to raise a complaint before, during and after employment even anonymous.*
 - e. *Encouraged to report suspected or actual occurrence(s) of illegal, unethical or inappropriate behaviors or practices. In case of reporting, they are not considered as 'problematic' or 'complainer'.*
 - f. *Protected against retaliation, including no blacklisting for raising grievances.*
10. *Respect the human rights of communities that our business impacts.*
11. *Prohibit flawed, falsified or shammed logged work/rest hours.*



OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

COMPANY'S POLICIES AND MANAGEMENT COMMITMENT HUMAN RIGHTS POLICY

Prohibition of forced labor, child labor and human trafficking

ALPHA GAS S.A.:

- 1.** *Commits to a workplace free from human trafficking, forced labor and unlawful child labour. Minimum age for employment ashore and onboard is 18 years.*
- 2.** *Has zero tolerance against such activities. Company employees, contractors, subcontractors, vendors, suppliers and others through whom the Company conducts business must avoid any action that constitutes trafficking in persons, forced or child labor and must comply with all relevant applicable laws and Company recommendations.*
- 3.** *Ensures that its employees are of legal working age and comply with ILO and MLC standards, and with the applicable State laws.*
- 4.** *Takes measures to verify, evaluate, promote awareness about and address risks associated with forced labor, child labor and human trafficking, such as:*
 - a.** *Assessing and addressing business risks of forced labor and human trafficking*
 - b.** *Auditing supplier compliance with applicable anti-slavery and human trafficking laws*
 - c.** *Awareness of Company employees.*

All personnel and hired contractors are required to comply with this policy.

Date: 18/02/2025
