

Human Rights Policy

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1. Purpose

Ethical behaviour is central to our approach to business. The purpose of this Human Rights Policy (the “Policy”) is to set out AGL Energy Limited’s (AGL’s) expectations and commitments relating to the human rights of our employees, customers, suppliers and the communities in which we operate or who are affected by our operations.

2. Scope

This Policy applies to all AGL’s businesses and transactions in all countries within which we operate, and applies to:

- AGL and all subsidiary and affiliate entities over which we exercise control;
- All directors, officers and employees of AGL, whether permanent, fixed-term or casual (collectively referred to as “Employees”); and
- All visitors and other personnel present on AGL work sites, using our facilities or dealing with our employees and contractors.

In line with AGL’s Supplier Code of Conduct, it is also AGL’s expectation that all suppliers read, understand and comply with the commitments set out in this Policy.

The commitments in this Policy are complemented with a suite of AGL policies and frameworks aimed at protecting and upholding human rights within our operations and supply chain.

3. AGL’s Commitment to Human Rights

AGL respects the dignity and human rights of all people, and upholds internationally and domestically recognised human rights standards including those set out in the International Bill of Rights¹ and the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work. We conduct our business in a manner consistent with the UN Guiding Principles on Business and Human Rights and the UN Global Compact’s 10 Principles, and are specifically committed to:

Supporting and respecting human rights. We support and respect the human rights of our people by operating ethically and fairly in our business and by living our values. We aim to ensure that we are not causing, contributing or directly linked to human rights abuses and seek to prevent or mitigate any human rights impacts arising through our operations or supply chain. As part of this commitment, AGL seeks to take a survivors first approach to identifying, assessing and addressing modern slavery in our operations and supply chain.

Protecting labour rights. We protect labour rights by acknowledging our moral and legal obligation to ensure that all workers are treated fairly, both in our own organisation and within the organisations we do business with. This includes ensuring workers’ rights to freedom of association and collective bargaining, freedom from slavery, servitude, forced, compulsory and

¹The International Bill of Human Rights includes the Universal Declaration of Human Rights, the International Covenant on Economic Social and Cultural Rights and the International Covenant on Civil and Political Rights.

child labour, fair and just working conditions, appropriate employment protections, just and favourable remuneration, reasonable limitations to working hours, reasonable rest and leave and the right to be free from discrimination in respect of employment and occupation.

Working to reduce our environmental impact. We understand that human rights and the protection of our environment are inextricably linked. We recognise our business and the decisions we make can have an impact on the environment, and work collaboratively to minimise and mitigate this impact.

AGL implements the above commitments through various policies, standards and codes, including through our Code of Conduct, Diversity and Inclusion Policy, Health, Safety and Environment Policy, Whistleblower Protection Policy, Greenhouse Gas Policy, Risk Management Policy, Supplier Code of Conduct, and other internal policies and standards relating to Contingent Workers and Recruitment. In addition, our commitments to decarbonisation are detailed in our Climate Transition Action Plan.

4. Human Rights Due Diligence and Monitoring

AGL recognises we must undertake ongoing due diligence to assess the human rights context of our activities, including the impacts we may cause and those we may contribute or be directly linked to, and that we must adapt and improve our response in line with any changes to the risk landscape.

Human rights risks are identified, managed and monitored in accordance with our standard risk management processes. Should a material change occur within our business, specifically within our supply chains and operational sites, AGL will conduct a review of our human rights risk assessment to ensure that all risks and potential impacts are captured. In addition, AGL will update our risk management processes and training to support the business units in responding to these changes.

AGL expects suppliers to undertake a similar proactive due diligence and risk management approach for the management of human rights risks both in their operations and supply chain.

5. Grievances and Remediation

AGL seeks to avoid causing, contributing or being directly linked to human rights violations across our operations and supply chains.

We encourage all our Employees, customers, suppliers and other stakeholders to report any concerns relating to our activities and suspected violations of our policies, including this Policy, via the mechanisms described in our Whistleblower Protection Policy. In instances where a person would like to make an anonymous report, AGL has engaged Your Call to provide external third party whistleblower services. Your Call is available 24 hours a day, 7 days a week. Contact details for Your Call are as follows:

Phone: 1800 940 379

Website: www.yourcall.com.au/report. (Reference AGL as the organisation ID)

As outlined in the Whistleblower Protection Policy, if a grievance is lodged, AGL will assess the information reported and determine an appropriate course of action. Should AGL be suspected of causing, contributing or be directly linked to a human rights violation, we are committed to investigating, addressing and responding to any concerns and taking the appropriate corrective actions as required.

AGL will not tolerate any detrimental conduct against any person who has or may make a report or who is believed to have done so, about our activities and suspected violation of our policies, including this Policy. This extends to the person's colleagues, employer (if a contractor) or relatives. Similarly, AGL will not tolerate any threats to cause detriment.

6. Responsibilities and Review

The Executive Leadership Team are ultimately responsible for overseeing human rights risks within AGL's operations and supply chains. The day-to-day responsibility for managing human rights sits within our Business Units, requiring Business Units to implement processes and controls to ensure compliance with this Policy.

Business Unit leadership is responsible for reviewing and overseeing compliance with our policies and standards, including those relating to Human Rights. The Group Risk, Compliance and Insurance team is responsible for assessing the effectiveness of the Policy and supporting Business Units to incorporate human rights considerations into relevant policies, standards, frameworks and action plans and associated training programs as relevant.

This Policy is to be reviewed and approved by the Board no less frequently than every two years.

7. Training and Communications

AGL's Human Rights Policy is communicated to Employees through internal communication channels and is integrated within relevant training programs. AGL's Supplier Code of Conduct, which is provided to all Suppliers, directly refers to this Policy where relevant.

Our commitment is to report regularly to stakeholders on the work we are doing to respect human rights within our operations and supply chains and to communicate learnings from our experiences internally with our Employees, as well as externally with our suppliers and other members within our industry.