



Policy

Human Rights Policy

This Policy relates to:

All AGL Employees and Business Partners



1. Purpose

AGL respects the dignity and human rights of our Employees, customers, and the communities in which we operate and that are affected by our operations. Human rights are based on principles of dignity, equality and mutual respect, which are shared across cultures, religions and philosophies. They are about being treated fairly, treating others fairly and having the ability to make genuine choices in our daily lives.

The purpose of this Human Rights Policy (the “Policy”) is to ensure our Employees and Business Partners¹:

- operate in a way that supports these human rights principles
- understand that it is our responsibility to respect, uphold and contribute to the realisation of human rights through our operations, business relationships and supply chains; and
- endeavour to avoid complicity in adverse human rights abuses.

This commitment is fundamental to AGL’s core values and essential to maintaining our social licence to operate. Through our business, we aim to create positive contributions to the realisation of a range of human rights by living our values.

2. Scope

This Policy is a critical part of our overall risk management framework to prevent and detect corrupt, illegal or other undesirable conduct. 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.

This Policy applies to all our businesses and transactions in all countries within which we operate, and covers:

- 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”)

AGL is committed to operating in a manner consistent with the laws and jurisdictions in which our businesses operate, including those relating to human rights and modern slavery, and the highest standards of integrity, fairness and ethical conduct. In the instance of this Policy conflicting with local laws, we will follow local laws while trying as far as possible to act in accordance with the spirit of this Policy.

¹ This includes, but is not limited to, contractors, consultants, third party agents, third party introducers, referrers, persons acting in a fiduciary capacity, service providers and joint venture partners in any of AGL’s operations (collectively referred to as “Business Partners”).

3.AGL's Commitment to Human Rights

AGL respects internationally and domestically recognised human rights standards, including:

- Universal Declaration of Human Rights (UDHR)
- Labour standards set out in the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- UN Global Compact Principles (UNGC).

AGL believes protecting and upholding human rights within our operations and supply chains is vital to realising human rights for our people, the people we work with, our customers and the communities in which we operate. AGL expects its Employees and subsidiary or affiliate entities to protect and uphold human rights in our operations and supply chains; and expects the same from our Business Partners.

In line with the above principles, AGL, our Employees and our subsidiary and affiliate entities are committed to:

Supporting, respecting and upholding human rights. We support and respect the human rights of our people by operating ethically and fairly in our business and living by 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. AGL implements this commitment through its [Code of Conduct](#), [Diversity and Inclusion Policy](#), [Health, Safety and Environment Policy](#), [Supplier Code of Conduct](#) and [Whistleblower Protection Policy](#).

Protecting labour rights. We do this 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 child labour, fair and just working conditions, protections for unemployment, just and favourable remuneration, reasonable limitations to working hours, reasonable rest and leave and freedom from discrimination in respect of employment and occupation. AGL implements this commitment through its [Code of Conduct](#), [Diversity and Inclusion Policy](#), [Health, Safety and Environment Policy](#), [Supplier Code of Conduct](#) and [Whistleblower Protection Policy](#) and other internal policies and standards relating to Contingent Workers and Recruitment.

Working to reduce our environmental impact. We know human rights and environmental protection are inextricably linked. We recognise our impact on the environment and work collaboratively to minimise and mitigate this impact. Our aspiration of zero harm to our people, the environment and the communities in which we operate embodies this, and we put this in practice through our [Code of Conduct](#), [Health, Safety and Environment Policy](#), [Greenhouse Gas Policy](#), [Climate Statement](#) and [Supplier Code of Conduct](#).

4.Human Rights Due Diligence and Monitoring

AGL believes it is important to identify, mitigate and address human rights risks for our Employees and communities and expects Business Partners to undertake a similar proactive approach.

We recognise we must continuously 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. Should a material change occur within our business, specifically within our supplier 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. This assessment helps determine the prevention,

mitigation and/or remedy measures required to protect and uphold human rights. Recognising the importance of due diligence, monitoring and reviews, we are implementing a decentralised due diligence and risk assessment process for our operations and supply chain.

5. Grievances and Remediation

AGL seeks to avoid causing or contributing to human rights violations across our - or our Business Partners' - operations and supply chains.

We encourage all our Employees, Business Partners, communities and customers to report and express any concerns relating to our activities and suspected violations of our policies, including this Policy, via the mechanisms described in our [Whistleblower Protection Policy](#).

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 or contributing to a human rights violation, we are committed to investigating, addressing and responding to any concerns and taking the appropriate corrective actions if required.

6. Responsibilities and Review

Human rights risks and issues can arise as a result of any of AGL's operations or supply chains, therefore the day-to-day responsibility for managing human rights sits within each Business Unit. This includes implementing processes and controls to ensure compliance with this Policy.

The Executive Leadership team are ultimately responsible for overseeing human rights risks within their operations and supply chains. The Business Units themselves are responsible for reviewing and overseeing human rights regulatory compliance with our policies and standards. The Group Risk, Compliance and Insurance Team is responsible for 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 no less frequently than every two years. Material changes to this Policy require Board approval.

7. Training and Communications

Sharing information and building awareness around human rights is pivotal to the success of our commitment. AGL's Human Rights Policy is disseminated 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 intention is to report regularly to stakeholders on the work we are doing to respect human rights within our operations and supply chains, through conducting annual reviews of our Human Rights Policy and Modern Slavery Statement and updating our website with key information. Going forward, we plan to communicate what we have learnt from our experiences internally with our Employees, as well as externally with our suppliers and other members within our industry.

8. Going Forward

Our approach to managing human rights risks is constantly evolving as we learn from our experiences. We intend to leverage these lessons and continually refine and improve our approach to human rights.

