



## Human Right Policy

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**This Policy relates to:**

All AGL Energy Limited Employees and Suppliers

# 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 covers:

- AGL and all subsidiary and affiliate entities over which we exercise control; and
- All directors, officers and employees of AGL, whether permanent, fixed-term or casual (collectively referred to as “Employees”).

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.

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.

# 3. AGL’s Commitment to Human Rights

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. AGL is committed to respecting and upholding human rights, including the rights set out within the following internationally and domestically recognised human rights standards:

- 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 suppliers. 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 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. This commitment is implemented through AGL’s Code of Conduct, Diversity and Inclusion Policy, Health, Safety and Environment Policy, Supplier Code of Conduct, Risk Management Policy and Whistleblower Protection Policy.

**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 child labour, fair and just working conditions, appropriate employment protections, 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 these commitments through its Code of Conduct, Diversity and Inclusion Policy, Health, Safety and Environment Policy, Supplier Code of Conduct, Risk Management Policy and Whistleblower Protection Policy and other internal policies and standards relating to Contingent Workers and Recruitment.

**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. We put in practice actions to minimise environmental impact through our Code of Conduct, Health, Safety and Environment Policy, Greenhouse Gas Policy, Risk Management Policy and Supplier Code of Conduct. In addition, our commitments to decarbonisation are detailed in our Climate Transition Action Plan.

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.

## 4. Human Rights Due Diligence and Monitoring

AGL believes it is important to identify, assess, mitigate and address human rights risks in our operations and supply chain and expects suppliers to undertake a similar proactive approach.

We recognise 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.

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.

## 5. Grievances and Remediation

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

We encourage all our Employees, communities, customers and suppliers 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, a third party operated call centre is available as follows:

**Phone:** 1800 940 379

**Website:** [www.yourcall.com.au/report](http://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.

## 6. Responsibilities and Review

Human rights risks and issues can arise as a result of any of AGL's operations or supply chains, and as a result the day-to-day responsibility for managing human rights sits within our Business Units. 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 AGL's operations and supply chains. Business Units leadership is 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 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.