

Harmony Energy Income Trust plc

Human Rights Policy

Approved and adopted by the Board of Directors of Harmony Energy Income Trust plc
on 22 May 2024

1. Introduction

Harmony Energy Income Trust plc (the "**Company**") is an investment company focused on investing in energy storage and complementary renewable energy generation assets, with an initial focus on a diversified portfolio of utility scale battery energy storage systems ("**BESS**") in Great Britain.

The Company also recognises the link between the sound management of material Environmental, Social, and Governance ("**ESG**") issues and the creation of long-term investment value.

2. Purpose

This Human Rights Policy (the "**Policy**") outlines how human rights-related impacts, risks and opportunities are identified, managed, and mitigated by Harmony Energy Income Trust plc and its direct and indirect subsidiaries (the "**Group**"); how human rights considerations should be integrated into the activities of the Group; and what human rights standards should be adhered to by its suppliers and partners to ensure compliance with its legal obligations.

3. Scope

This Policy applies to the Group from the date of adoption.

This Policy is embedded in the Company's Supplier Code of Conduct, and all suppliers, service providers and business partners of the Group are expected to implement effective systems to adhere to this Policy.

4. Governance, roles, and responsibilities

The Board of the Company has ultimate responsibility for implementation and oversight of this Policy. The Board has delegated certain human rights-related activities to its committees:

- The Board has delegated human rights and modern slavery performance monitoring to the ESG Committee (the "**Committee**"). Meeting at least once a year, the Committee also provides a forum for discussion and support to the Investment Adviser (as defined below) with respect to human rights and modern slavery. The Chairperson of the Committee reports formally to the Board on the Committee's proceedings after each meeting.

- The Board has delegated human rights risk evaluation and oversight to the Audit and Risk Committee (the “**ARC**”). Meeting at least three times a year, the duties of the ARC include ongoing evaluation of the risk management and internal controls of the Company, including human rights-related risks and opportunities. The Chairperson of the ARC reports formally to the Board on the Committee’s proceedings after each meeting.
- The Board has delegated monitoring and reviewing of service providers’ human rights performance to the Management Engagement Committee (the “**MEC**”). Meeting at least once a year, the MEC is responsible for monitoring the performance of service providers, including their human rights performance and adherence to the Supplier Code of Conduct. The Chairperson of the MEC reports formally to the Board on the MEC’s proceedings after each meeting.

Harmony Energy Advisors Limited (the “**Investment Adviser**”) is responsible for ensuring the effective implementation of this Policy in all investment processes, asset management and any relevant supply chain activities. The Company also requires that the Investment Adviser takes direct responsibility for the preparation and provision of relevant human rights and modern slavery metrics for disclosure.

The commitments made within this Policy will be delivered by the Company’s key suppliers and service providers, who work together to monitor, manage, and report human rights and modern slavery performance across the asset lifecycle and any relevant supply chain activities.

5. Policy

The ethical treatment of all people and regard for human rights are central to the Company’s mission of powering a sustainable future.

As an investment trust, the Company has no offices or employees, but it recognises that its operations – and those of its subsidiaries – impact on human rights, both directly and indirectly, through their own activities or business relationships in the supply chain. This Policy sets out the Company’s commitment to zero tolerance of human rights abuses in all its forms.

The Company is committed to ensuring that its assets are designed, constructed, operated, and decommissioned in compliance with all relevant legal and regulatory obligations. It seeks to exceed these minimum standards, wherever possible, through the following policy principles:

- **Modern slavery, forced labour and human trafficking**

The Company is committed to preventing and eliminating modern slavery, forced labour and human trafficking in all its forms in both its operations and supply chain.

- **Child labour**

The Company respects the rights of children and young workers. This includes preventing and eliminating instances of child labour in its operations and supply chain. The Company

adheres strictly to any local and national laws relating to the employment of underage workers.

- **Fair labour conditions**

The Company is committed to ensuring that people are paid a fair wage for the work they are doing with a reasonable work/life balance. Wages and other remuneration are paid in accordance with legislation, respecting collective bargaining agreements and industry agreements where required. Working hours are not excessive and comply with local labour legislation.

The Company respects the right of workers to join independent trade unions, form collective bargaining agreements, and have freedom of association. The Company has the same expectations of contractors on site and workers of its suppliers.

- **A safe and respectful work environment**

The Company is committed to providing working conditions that are safe. During the design, construction, operation and decommissioning phases of its assets, adverse health and safety impacts on the people working on its sites are avoided and, where they do occur, they are investigated and addressed in line with legal requirements. The same is required from all stakeholders in the supply chain and communicated through the Company's Supplier Code of Conduct.

The Company is committed to providing a respectful work environment. The Company has zero tolerance for discrimination on the grounds of race, religion, gender, age, sexual orientation, disability, nationality, or neurodiversity status. The Company does not allow harassment or abusive behaviour, including bullying, harsh or inhumane treatment or physical disciplinary action.

- **Engaging local communities and respecting land rights**

The Company recognises that the design, construction, operation and decommissioning of its assets have a direct impact on people living and working in the vicinity. The Company is therefore committed to engaging proactively and transparently with all those impacted. Whilst its focus is to avoid adverse impacts where possible and promote positive impacts through its community programme, the Company also works hard to ensure that its stakeholders always feel heard.

The Company recognises that many of the world's natural resources are found on the lands of Indigenous Peoples and that its supply chain impacts those people directly. The Company is committed to engaging relevant stakeholders to advance human rights standards together, including contractors and suppliers, and embeds those expectations in its Supplier Code of Conduct.

- **Access to remedy**

The Company is committed to providing access to remediation, if any human rights adverse impacts were to occur. The Company has a Whistleblowing Policy for raising any concerns or

reporting any wrongdoing through established channels. Additionally, as sites are operated by the Investment Adviser on behalf of the Company, the Investment Adviser has put in place a Grievance Policy for workers to raise complaints.

6. Relevant frameworks and standards

The Company is committed to using and reporting according to internationally recognised frameworks and standards. In preparing this Policy, the principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Finance Corporation's Performance Standards, the International Bill of Human Rights, the Voluntary Principles on Security and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work were consulted.

7. Reporting and disclosure

Reporting and disclosure are important for investors and other stakeholders in understanding how human rights-related risks and opportunities are identified, monitored, and managed. The Company is committed to publishing an annual Modern Slavery Statement as well as a human rights-related performance update annually as part of its financial reporting disclosures.

8. Review

The ESG Committee is responsible for the review of this Policy at least annually to ensure its effectiveness. Any revisions will be recommended to the Board for consideration and approval.