

27, Lev Tolstoy Street – MD 2001, Chisinau – Republic of Moldova Tel +373 (22) 889 300 – Fax +373 (22) 889 301

Corporate Human Resources Policy

1. Introduction

At Transoil-Group of Companies ("TOGC"), we are committed to responsible business practices, compliance with applicable laws, high standards of integrity and ethical conduct, and respect for the rights and dignity of all people, including our employees and people in the communities in which we operate.

TOGC's commitment to respecting human rights is embedded throughout our corporate policies and practices, which are guided by the United Nations International Bill of Human Rights, the International Labour Organization's eight Fundamental Conventions ("ILO") and the United Nations Guiding Principles on Business and Human Rights ("UN").

2. Commitment to Human Rights

We recognize our responsibility to respect, protect and promote human rights in our employment relationships with our employees. We strive to ensure that our activities respect the human rights of every individual.

3. Fundamental principles

Our Human resources policy is based on the following key principles, aligned with ILO and UN guidelines:

- a. Universality, indivisibility and interdependence of human rights: We recognize that human rights are universal and apply to all people, irrespective of nationality, race, sex, religion or other characteristic. All rights (civil, political, economic, social and cultural) are interdependent and indivisible.
- b. **Promote fundamental rights at work:** we respect freedom of association, the right to collective bargaining, and the abolition of forced labor and child labor. Employment at TOGC is freely chosen, and employees have the right to leave their employment at any time with reasonable notice.
 - c. Elimination of discrimination: Discrimination and harassment are not tolerated in our workplace.
- d. Equal opportunities. Participation and inclusion. Dialogue: We treat all employees with dignity and respect. We promote a fair work environment where all employees have equal opportunities for professional development. Every employee has the right to participate actively in the processes that affect their life, including in the workplace, in decision-making, and in judicial processes. Every employee has the right to free expression and inclusive participation. We promote open dialogue between employee-employee, and between employees and management, as well as unions.
- e. Social protection. Wages. Fairness. Working hours: We ensure a system of social protection for all workers, including decent wages, safe working conditions, and access to social benefits. We ensure that the wages paid to employees meet or exceed minimum legal standards and are sufficient to meet basic needs as well as to provide discretionary income. We comply fair pay principle. We comply with applicable legislation on working hours, rest periods, and overtime compensation.
- f. Safe and healthy working conditions: We are committed to providing a safe and healthy working environment for all employees. We comply with all applicable occupational health and safety laws and regulations.



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g. Accountability and legislation: We hold ourselves accountable for our actions. We undertake our obligation to respect applicable legislation, human rights and employees' rights.

4. Implementation and monitoring

We implement this policy by the following:

- a. Effective human resource management: We ensure compliance with labor law rules, formal employment of employees on the basis of an employment contract, transparency and fairness in the process of recruitment, selection and hiring of human resources, performance appraisal, motivation and compensation of employees. We support and plan for succession.
- b. Training and awareness: We provide regular training and education programs for employees and management that meet the demands of the labor market, including highlighting human rights issues and our commitments. We aim to raise awareness among employees about their fundamental rights and how to claim them. We support young and new employees in acquiring better skills. We promote a corporate culture that upholds TOGC Company values.
- c. **Due Diligence:** We conduct regular due diligence to identify, prevent, mitigate and communicate concrete human rights impacts. We monitor and evaluate compliance with employee rights and labor legislation.
- d. **Stakeholder involvement:** We involve stakeholders, including employees, unions, management and leadership, as well as the community, to understand and address employee rights issues. We implement best practices from other countries and international collaboration among our employees in the countries where we operate.
- e. Grievance redress mechanism: We establish access to and effective resolution of grievances to enable employees to raise their concerns about human and labor rights issues without fear of retaliation.
- f. Approval of human resources policies: we are committed to implementing detailed human resources policies on human resources processes, such as:
 - a) Corporate recruitment, selection and hiring policy,
 - b) Corporate roles and responsibilities policy,
 - c) Corporate employee motivation, compensation and engagement policy
 - d) Corporate employee training and development policy,
 - e) Corporate employee promotion policy.

5. Reporting and Accountability

We are committed to making our human resources practices transparent by regularly reporting our progress and targets. We hold ourselves accountable to our stakeholders by continuously monitoring and evaluating our human resources performance.



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6. Review and Continuous Improvement

This policy will be reviewed periodically to ensure its relevance and effectiveness. We are committed to continuously improving our workplace rights practices and adapting to new challenges and opportunities.

7. Conclusion

At TOGC, respect for human and labor rights is a fundamental value that underpins our actions and decisions. We are committed to making a positive impact and contributing to building a community in which human and labor rights are widely respected and consistently protected.

As Chairman of the Board of Directors and as being authorized for this purpose by the Board of Directors corporate resolution dated 19 May 2025, I approve this human resources policy and I am committed to upholding it and improving our social performance.

Approved:

Vaja Jhashi

Chairman of the Board of Directors

TRANS-OIL Group of Companies