

Human Rights Policy

Effective Date: January 5th, 2026

Last Reviewed: January 5th, 2026

Next Review Date: January 5th, 2027

1. Purpose

Legacy Energies Inc. is committed to respecting and promoting human rights in all our operations and business relationships. This policy reflects our adherence to the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Universal Declaration of Human Rights, and the International Labour Organization (ILO) core conventions.

2. Scope

This policy applies to all employees, officers, directors, contractors, suppliers, and third-party representatives operating on behalf of Legacy Energies Inc. It governs all activities within Legacy's global operations, including upstream, midstream, and downstream activities, as well as our partnerships and supply chain.

3. Policy Statement

Legacy Energies Inc. is dedicated to safeguarding human rights in every region where we operate. We are committed to identifying, preventing, and mitigating any adverse human rights impacts that may result from our business activities, both directly and through our supply chain.

4. Key Human Rights Commitments

4.1 Respect for International Standards:

We adhere to internationally recognized human rights standards, including:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO Core Conventions, particularly concerning forced labor, child labor, freedom of association, collective bargaining, non-discrimination, and equal opportunity.

4.2 Non-Discrimination & Equal Opportunity:

Legacy prohibits discrimination based on race, color, gender, age, nationality, religion, sexual orientation, disability, or any other characteristic protected by law. We promote an inclusive workplace where diversity is valued, and all employees have equal opportunities for growth and development.

4.3 Forced Labor & Human Trafficking:

Legacy Energies Inc. strictly prohibits any form of forced labor, bonded labor, involuntary prison labor, or human trafficking within our operations and supply chain. We ensure that all workers, including migrant workers, are treated with respect and dignity.

4.4 Child Labor:

We adhere to the minimum working age as specified by ILO Convention 138 and local laws. No one under the age of 18 shall be employed in hazardous work or conditions that could jeopardize their health or development.

4.5 Freedom of Association & Collective Bargaining:

We respect our employees' right to form and join trade unions and bargain collectively, as outlined in ILO Conventions 87 and 98. We engage in open and constructive dialogue with worker representatives and ensure non-retaliation against employees exercising these rights.

5. Supply Chain Due Diligence

5.1 Supplier Compliance:

We require our suppliers, contractors, and partners to respect and uphold the same human rights principles. This is outlined in our Supplier Code of Conduct, which is regularly communicated and reinforced.

5.2 Human Rights Assessments:

Legacy conducts human rights due diligence to identify and assess potential risks in our operations and supply chain. This includes:

- Risk Assessments: Evaluating operations for risks related to forced labor, child labor, unsafe working conditions, and discrimination.
- Audits: Regular audits of suppliers and contractors to ensure compliance with human rights standards.

5.3 Mitigation:

If any adverse human rights impacts are identified, Legacy will take immediate steps to mitigate these impacts and provide remedy through collaboration with affected individuals, communities, and relevant stakeholders.

6. Grievance Mechanisms & Reporting

6.1 Grievance Mechanism:

Legacy Energies Inc. provides multiple channels for employees, contractors, and community members to report any human rights concerns, including:

- Internal Grievance Channels: Employees can report concerns through direct supervisors, the Human Resources Department, or through the Whistleblowing Hotline.
- External Channels: Communities and other external stakeholders can report issues through our community engagement team or local offices.

6.2 Confidentiality & Non-Retaliation:

Legacy ensures that all reports are handled confidentially, and no employee or stakeholder will suffer retaliation for raising a human rights concern in good faith.

7. Stakeholder Engagement

7.1 Community Engagement:

We are committed to maintaining open dialogue with local communities where we operate. Legacy seeks to understand the concerns of local stakeholders, especially in areas of human rights, and to incorporate feedback into our decision-making processes.

7.2 Collaboration with NGOs & Industry Initiatives:

Legacy actively collaborates with civil society organizations, industry initiatives, and human

rights bodies to improve our approach to respecting human rights. We engage in multi-stakeholder initiatives such as the Voluntary Principles on Security and Human Rights (VPSHR).

8. Monitoring, Auditing & Continuous Improvement

8.1 Monitoring & Audits:

Legacy regularly monitors compliance with our Human Rights Policy across all operations. We conduct audits, both internal and by independent third parties, to assess our human rights impact and performance.

8.2 Policy Review:

This policy is reviewed annually, or more frequently if required, to ensure alignment with evolving international standards, regulatory changes, and best practices. Legacy also incorporates feedback from audits, investigations, and stakeholder engagement to continuously improve our human rights approach.

9. Accountability and Enforcement

9.1 Responsibility:

All Legacy employees are responsible for upholding this policy. Managers and supervisors are responsible for ensuring that human rights risks are identified and addressed in their areas of responsibility.

9.2 Consequences for Non-Compliance:

Any employee, contractor, or supplier found to be in violation of this policy will face disciplinary action, which may include termination of employment or contracts, and could result in legal action where applicable.