

# **HUMAN RIGHTS POLICY STATEMENT OF SOCIETATEA NAȚIONALĂ DE GAZE NATURALE "ROMGAZ" S.A.**

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## Preamble

SOCIETATEA NAȚIONALĂ DE GAZE NATURALE “ROMGAZ” S.A. (hereinafter referred to as “ROMGAZ” or the “Company”) with registered office in Medias, Romania, is the largest natural gas producer and the main supplier in Romania. Starting with 2013, Romgaz was publicly listed on Bucharest Stock Exchange (BVB) and on London Stock Exchange (LSE). The majority shareholder is the Romanian State owing a 70% stake.

ROMGAZ undertakes geological exploration to discover new gas reserves, extracts natural gas from existing fields, stores natural gas in the underground deposits and performs well interventions, workover and special operations. In addition, the company provides professional technological transportation services of goods and people, as well as special facilities for gas industry. Romgaz also extended into the production and supply of electricity by the integration of CTE Iernut.

Currently, ROMGAZ organization corresponds to a hierarchy-type structure, with 6 hierarchy levels from the company’s shareholders to the executive personnel. The Company includes its headquarters and eight branches, established based on both the specificity of the activities carried out and territoriality, as follows: Mediaș Branch, Târgu Mureș Branch, Buzău Branch, Well Workover, Recompletion and Special Well Operations Branch (SIRCOSS), Technological Transport and Maintenance Branch (STTM), Electric Power Production and Supply Branch, Drobeta-Turnu Severin Branch and Chișinău Branch.

Filiala de Înmagazinare Gaze Naturale Depogaz Ploiești S.R.L. and Filiala ROMGAZ BLACK SEA LIMITED are 100% owned by ROMGAZ, as well.

Please find more information available on the company’s web site: [www.romgaz.ro](http://www.romgaz.ro).

## Human Rights

ROMGAZ is committed to respect and promote the fundamental human rights in all its activities, in accordance with applicable international, national regulations and social responsibility standards.

At ROMGAZ we comply with nationally and internationally recognized standards on employees’ rights and encourage personnel involvement in the company’s sustainability management, implement national and international standards on working conditions, trade union rights, right to information, health protection and occupational safety.

We aim to create inclusive, safe and ethical workplaces, as we have committed to in our Code of Ethics and Business Conduct, our Equal Employment Opportunity Statements and our other human resources or social responsibility policies. In keeping with our mission and as part of our ongoing sustainability efforts, we have developed this Human Rights Statement to reaffirm the expectations of our employees, business partners, contractors and suppliers with respect to certain legal requirements, ethical practices and human rights.

We also promote equal opportunities, diversity and inclusion, fair pay and a balance between personal, family and professional life (career).

Within ROMGAZ, the recruitment, employment, promotion and professional development of a diverse workforce are supported by internal regulations and practices implemented on the principle of non-

discrimination. Equally, training, promotion and compensation are based on the employee's skills, achievements, experience, diversity of talents and behavior, without any discrimination.

Our objectives also include increasing the level of skills and competencies of all employees, adapting to changing demographic conditions and demographic changes, promoting the ability of all employees to participate in working life, especially in terms of education (training programs, assistance in skills enhancement), health management, digitalization and addressing the challenges of demographic changes, regular performance and career development reviews.

Employee safety is ROMGAZ's highest priority and more than our number one value. It is the foundation of who we are and drives everything we do as a company.

We expect our employees and suppliers to operate safely and in an environmentally and human resource responsible manner and to report any workplace conditions that may be unsafe.

We support inclusion and diversity at ROMGAZ and recognize the value of each employee's unique voice and perspective. We believe in listening to understand and learn from what we hear. As a leader in our industry and the communities we serve, we are committed to listening and learning.

We expect our employees and our suppliers in our supply chain to adopt, enforce and comply with all applicable laws, rules and regulations relating to respect for human rights.

Our human rights policy is based on the following principles:

### **Respect for Fundamental Rights**

ROMGAZ recognizes and respects all the fundamental rights and freedoms set forth in the Universal Declaration of Human Rights and other international human rights conventions and treaties. We are committed to respect the right of every person to dignity, equality, liberty and opportunity.

The International Labor Conference adopted the ILO Declaration on Fundamental Principles and Rights at Work in June 1998. In adopting this Declaration, ILO members renewed their commitment to respect, promote and realize the following fundamental principles and rights at work:

- (a) freedom of association and effective recognition of the right to collective negotiations;
- (b) the elimination of all forms of forced or involuntary labor;
- (c) the effective abolition of child labor;
- (d) the elimination of discrimination in respect of employment;

The ILO Declaration on Fundamental Principles and Rights at Work applies to all members.

### **Freedom of Association**

ROMGAZ respects the right of employees to organize and negotiate collectively, in accordance with national legislation and ILO core international conventions.

We shall respect the rights of our employees to associate, self-organize, form, join or assist trade union organizations, together with the right to negotiate collectively through representatives of their choice on wages, hours and working conditions or to refrain from engaging in such activities.

## **Fight against Forced Labor and Exploitation**

We shall not use or participate in the exploitation of the employees or in forced or involuntary labor, including human trafficking.

We are committed to combating all forms of forced labor, human trafficking and child exploitation within our company. We comply with legal minimum age requirements for employment in our business.

## **Prohibition of Discrimination and Harassment at Work**

ROMGAZ management does not tolerate any form of discrimination based on race, gender, sexual orientations, ethnic origins, social status, disability or any other characteristics. The Company promotes an inclusive and diverse work environment.

### **Measures against discrimination and harassment at work**

Discrimination and harassment, in any form, are not tolerated at ROMGAZ.

We are committed to providing a work environment where violence is not tolerated. Threats or attacks made directly or indirectly towards any worker, client or any other person in connection with employment relationships shall not be tolerated.

ROMGAZ employees or partners shall not engage in conduct that could be characterized as offensive, intimidating, humiliating, insulting to third parties.

To ensure that we comply with our commitments, we provide violence and harassment prevention training and continually improve our complaint mechanisms. We have established sanctions against violence and harassment in our Internal Rules, which we have made known to all employees.

## **Employment and Inclusion of People with Disabilities**

Although the specific activity of the company does not allow the hiring of disabled personnel in workplaces at risk, we nevertheless support the integration in our team of people with disabilities by creating easy access to the office area.

## **Safe and Fair Working Conditions**

ROMGAZ respects the right of its employees to safe and healthy working conditions, equitable remuneration, rest, holidays and a working environment without harassment or discrimination. We ensure that our employees have access to mechanisms for reporting abuse without fear of retaliation.

For cases where the job can no longer be supported, the Company implements social protection plans, in addition to those provided by the State, in accordance with the provisions of the Company Collective Labor Agreement, Internal Rules and internal procedures.

## **Working Time**

We comply with the legal requirements as regards the working time (maximum working hours). ROMGAZ advocates for the monitoring and limitation of overtime work, and for situations where overtime work is necessary, the Company obtains the employee's consent, except in case of force

majeure events or for urgent works meant to prevent the occurrence of certain accidents or to remove the consequences of an accident, and establishes various measures (by way of example, but without limitation to work rotation).

### **Adequate Wages**

ROMGAZ ensures fair working conditions for all employees. As regards the working hours and overtime work remuneration, we comply with the applicable legislation, the industrial standards and the Company Collective Labor Agreement. The wages and benefits that we pay to our employees comply with the relevant legislation, including the minimum wage, overtime work and regulated social benefits. ROMGAZ considers various methods of talent retention are considered, such as: regular salary review, promotion, professional training, financial incentives based on performance, that also consider the specific conditions of the activity. Our remuneration systems are uniform and transparent.

### **Work-Life Balance**

ROMGAZ supports strengthening of the work-life balance. To this end, we offer our employees a flexible working hour and we grant leave for family reasons and outside the original appointment.

We support the quality of privacy and provide financial support to access holiday and medical treatment tickets, under the terms of the Company Collective Labor Agreement as well as the applicable internal procedures.

### **Health and Safety at Work**

At ROMGAZ we are aware that health and safety at work is a priority. In this regard, the Company, through the authorized departments, ensures that its responsibilities in the field of Occupational Health and Safety are respected according to the applicable legislation in the field. We emphasize that we support our employees by providing access to medical services in addition to the medical services offered by the state health system.

We regularly analyze workplace safety and propose investments in safer, better and more efficient equipment.

Our primary objective is to reduce health and safety incidents and we support managerial accountability for health and safety issues by considering operating guidelines or procedures that are relevant to the industry in which we operate at group level.

### **Gender Equality and Equal Pay for Work of Equal Value**

ROMGAZ supports gender equality and equal pay for work of equal value.

### **Training and Skills Development**

We are convinced that our employees are our most important resource and we are a serious partner in developing their skills and broadening their career prospects. We continuously monitor skills need and rigorously document the training plan on a regular basis. We promote a culture of open feedback.

At ROMGAZ we assess job performance and, where appropriate, propose improvement measures to reduce skills gaps.

Within ROMGAZ there are specialized internship programs for pupils and students as well as offering scholarships for students in their final years of undergraduate and master's degree programs with the possibility of employment after graduation.

We offer free sessions through our Business Coaching for Personal Development, within the organization with a coach trained to IFC (International Coaching Federation) standards.

## **Diversity**

At ROMGAZ we believe in gender equality and we are proud to be an equal opportunity employer without gender discrimination. Our employees have different cultural backgrounds and bring different skills and talents to the Company, which help us to improve and innovate. All our employees are treated equally and fairly. The individual personality of each of our employee is considered and attention is paid to ensuring a stable work-life balance. We consider this to be an essential prerequisite for our employees' willingness to consistently deliver results at a high level and therefore an important element for the success of our company. We support the professional and personal development of our employees and, together with them, set ambitious but realistic goals.

## **Responsibility towards Communities**

In all our operations, we respect local communities and seek to bring economic and social benefits to them. We are committed to respecting the culture and natural environment of the communities in which we operate, promoting sustainable development and environmental protection.

## **Complaint and Remedial Mechanism**

ROMGAZ provides effective and confidential mechanisms for employees, partners and other stakeholders to report violations. We are committed to promptly investigate and remedy any complaints/complaints in accordance with internal procedures while complying with ethical standards and applicable law.

## **Respect for Human Rights in the Supply Chain**

We ensure respect for Human Rights both at the entity level and in the value chain, including the prevention of forced labor, child labor and all other forms of exploitation.

ROMGAZ requires its suppliers and partners to respect the same high standards on human rights and labor conditions, in line with the principles set out in ROMGAZ Responsible and Sustainable Procurement and Supply Chain Policy.

ROMGAZ also expects its suppliers to support and uphold ROMGAZ's commitment to human rights, as outlined above and in ROMGAZ Code of Ethics and Business Conduct.

## **Fight against Corruption**

ROMGAZ is committed to conduct its business without accepting any form of corruption or bribery, nor facilitating any payments or fraud. This commitment includes not engaging in offering or granting

and rejecting proposals for any type of benefit or any attempt to defraud, on behalf of employees, organizations or intermediaries, with the purpose of illegally influencing or deceiving any person.

### **Confidentiality**

ROMGAZ's business partners will respect the privacy of individuals and personal data protection laws; will only obtain and keep confidential information that is necessary and will provide appropriate information to data owners as required by law. ROMGAZ business partners will adopt appropriate security measures to ensure the confidentiality, integrity and availability of information.

### **Information Security**

ROMGAZ business partners shall treat information related to other business partners as confidential in accordance with applicable confidentiality provisions. Business partners shall adopt appropriate security measures to ensure confidentiality, integrity and availability of information. Business partners shall respect that valuable, confidential ideas, strategies and other business-related information created or developed by ROMGAZ are the property of the Company, and in certain cases are protected by intellectual property law.

### **Avoid Access to Information**

ROMGAZ business partners shall not use inside information illegally for material gain or disclose it to unauthorized persons. Business partners shall not spread false rumors in the market that may impact the financial instruments of the Company.

### **Final Provisions**

The entry into force and updating of the Declaration on Human Rights is binding and shall always be applied within all company structures, regardless of the position held within the company, both in relations with the internal environment, but also with the external organizational environment, in relations with customers, suppliers, civil society, local communities or other relevant stakeholders.

Proposals to amend and/or supplement the Declaration on Human Rights may be made by any person within ROMGAZ and shall be submitted in writing or electronically to [sustenabilitate@romgaz.ro](mailto:sustenabilitate@romgaz.ro), with the aim of remedying and correcting negative impacts.

They will be analyzed to be taken into account in the next steps to update and improve the Declaration.

This Statement is complemented by the provisions of the following internal documents: Code of Ethics and Business Conduct, Internal Rules, applicable Collective Labor Agreement, Rules of Organization and Operation, ROMGAZ internal policies and procedures, Codes of Conduct regulating the activity of different professions and applicable national and international legislation on the matter.

The Declaration on Human Rights drawn up by S.N.G.N. ROMGAZ S.A. enters into force on the date of publication and is valid for ROMGAZ and its business partners.

**Chief Executive Officer**  
**Răzvan POPESCU**