



## Human Rights Policy

The purpose of this public policy is to express Albireo Energy's commitment to respect and promote internationally recognized human rights standards, and to explain our approach to minimizing human rights impacts related to our business operations and supply chain.

**Albireo Energy is a leading independent building controls and energy services provider recognized by customers for creating intelligent, high-performance buildings. We help building owners and their teams make decisions about building automation that achieves operating performance, decarbonization and sustainability goals.**

### Approach

Albireo Energy and its subsidiaries (the "Company") are committed to respecting human rights. We believe that all persons are entitled to be treated with dignity and respect. Our Human Rights Policy is in conjunction with our Employee Handbook, our Employee Code of Conduct, and Conduct of Conduct for Third Parties, and all relevant policies and procedures. These policies drive engagement with key stakeholders, clients, colleagues, suppliers, and investors.

Our approach to human rights is guided by recognized standards such as the UN Guiding Principles on Business and Human Rights, and the UN Sustainable Development Goals. While governments have the primary responsibility to protect human rights, we recognize that we have a responsibility to prevent adverse impacts on human rights throughout our business and to influence and encourage our suppliers and other business partners to do the same.

### Labor Rights

**Child labor:** We reject all forms of child labor. We do not employ children below the legal minimum age of employment. We apply a minimum working age of 15 years, even where local legislation permits younger children to be employed. Employees under the age of 18 only perform work in accordance with local legal requirements.

**Forced labor:** We prohibit all forms of forced and compulsory labor. All labor must be voluntary. We do not tolerate any form of forced labor, including bonded labor, indentured labor, military labor, modern forms of slavery and any instances of human trafficking.

**Discrimination:** We do not tolerate discrimination, including any verbal or physical conduct that creates a hostile or offensive work environment, such as a person's race, gender, age, religion, disability, sexual orientation, or any other characteristic protected by law.

**Harassment:** We are committed to maintaining an environment free of harassment and intimidation. We do not tolerate any mental, physical, or sexual harassment, or any other infringement that violates an



employee's right to dignity and respect. We do not tolerate violence, threats, threatening or malicious behavior, intimidation, or any form of workplace violence. We have a zero-tolerance policy regarding sexual harassment in any setting including unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature.

**Wages and benefits:** We are committed to investing in the growth, success, and well-being of our employees. We provide fair, equitable and competitive pay and regularly review our compensation programs to ensure they are competitive compared to other organizations in the building controls and energy services industry. In addition, we provide health and wellbeing, insurance, and retirement programs that support the needs of our employees.

**Working time:** We adhere to applicable laws governing working time and paid leave. We respect the right to rest and leisure, including vacation with pay, and the right to family life. We provide an environment where employees can integrate and balance their work and home responsibilities and take care of themselves and their family.

**Freedom of association / collective bargaining:** We believe that employees and suppliers should have the right to bargain freely with employers. We respect rights related to freedom of association, if they are in accordance with all applicable labor and employment laws.

**External stakeholder human rights:** We strive to conduct business with individuals and organizations who share our commitment to high ethical standards and who operate in a socially and environmentally responsible manner. We expect all our suppliers and other business partners to uphold the human rights of their workers and to treat them with dignity and respect.

Our Code of Conduct for Third Parties is shared with all suppliers, is published on our website, and is included in all top-tier supplier agreements. As part of Albireo Energy's supplier pre-qualification process, suppliers are required to complete a comprehensive survey that includes evaluation of human rights factors. Only suppliers that meet the Company's standards in this area are eligible for selection.

Beginning in 2026, Albireo Energy is committed to further strengthening its oversight by implementing an annual review process to monitor the performance of its top 40 existing suppliers, including their adherence to human rights expectations.

### **Safety & Environmental Rights**

**Safety:** We strive to provide each employee with a safe and healthy work environment, including full compliance with all applicable health and safety laws and regulations, as well as compliance with internal health and safety policies. We have a CEO-led employee safety program that includes risk identification and mitigation, training and engagement, and leadership, reporting, and accountability at all levels of the organization.

**Physical Security:** We forbid the use of violence, threatening behavior, physical intimidation and any other form of physical or mental abuse.



**Protecting the environment:** We demonstrate respect for the environment by complying with both the intent and letter of the environmental laws and regulations in every jurisdiction in which we operate. We consider the impact of our operations and strive to operate our business sustainably to support the health of our planet and its people.

### **Data Privacy Rights**

**Privacy and data protection:** We are dedicated to respecting and safeguarding the privacy of individuals who place their trust in us by providing us with their personal information, recognizing it as a fundamental human right. This includes customers, suppliers, and employees. Our commitment extends from the point where we collect or acquire personal information (only collecting which is necessary to carry out the stated purpose, and nothing more), to how we use and manage it in our business, and to the point where we return or delete the personal data when it is no longer needed.

### **Reporting and Remediation**

**Grievance mechanisms / reporting channels:** As part of our overall ethics and compliance program, we have an established reporting channel, managed by a third party, that's available 24x7. Employees can confidentially report grievances or issues through a secure telephone number or online system.

**Response and remedy:** Our executive leadership team confidentially investigates and resolves any allegations of misconduct, including known or suspected violations of our Code of Conduct, internal policies, the law and other forms of misconduct.

**Employee training:** We integrate respect for human rights into our Company's annual Code of Conduct Training program. To ensure that our workforce is well informed on the importance of respecting human rights and adhering to our ethical standards, training on salient human rights topics and refresher training on our Code of Conduct is provided to all employees.

### **Oversight Responsibilities**

Oversight of the Human Rights Policy is a shared responsibility across all levels of Albireo Energy to ensure alignment with the company's values and commitment to respecting human rights.

**Leadership and Management** are responsible for setting the tone, promoting ethical business practices, and ensuring employees understand and uphold the company's human rights commitments.

**Human Resources, Compliance, and Operations** provide guidance, training, and support, and oversee the review and resolution of human rights-related concerns.

**Employees** are expected to act in accordance with this policy, uphold human rights principles, and report any suspected violations.

This Human Rights Policy is reviewed and updated annually by the Chairman and CEO, CFO (Compliance), CHRO, and Senior Vice President of Operations to ensure it remains relevant and effective. Violations of this



policy may result in disciplinary action, up to and including termination or reassessment of business relationships.

A handwritten signature in black ink that reads "Larry Wash".

Larry Wash  
Chairman and CEO  
Albireo Energy