

Corporate Gender-based Violence and Harassment Prevention Policy

1. Introduction

At Trans-Oil, we are committed to fostering a safe, respectful and inclusive work environment for all employees, suppliers, contractors and other stakeholders. This Gender-based Violence and Harassment (GBVH) Prevention Policy outlines our dedication to preventing, addressing and eliminating all forms of violence, harassment and abuse based on gender, in line with international standards such as the International Labour Organization (ILO) Violence and Harassment Convention (No. 190/2019), the principles of the United Nations Guiding Principles on Business and Human Rights and national legal frameworks. We uphold a zero-tolerance approach to any form of gender-based violence or harassment within our operations and supply chains.

2. Commitment to Gender-based Violence and Harassment Prevention

We recognize our responsibility to protect employees from all forms of gender-based violence and harassment, including but not limited to sexual harassment, physical, verbal, psychological and sexual abuse, and discrimination based on gender identity or expression. This commitment extends to all employees, suppliers, contractors and any stakeholders involved in our business activities.

3. Key Principles

Our Gender-based Violence and Harassment Prevention Policy is based on the following key principles:

- a. **Zero Tolerance:** We prohibit all forms of gender-based violence and harassment, including physical, verbal, psychological and sexual abuse, in the workplace and associated environments.
- b. **Safe Reporting Mechanisms:** We provide confidential, accessible and effective reporting channels for employees and stakeholders to raise concerns without fear of retaliation.
- c. **Respect and Dignity:** We promote a culture of mutual respect, ensuring that all employees are treated with dignity and fairness, regardless of gender, sexual orientation or identity.
- d. **Accountability and Disciplinary Actions:** We enforce strict consequences for violations of this policy, ensuring that all reports are taken seriously and investigated thoroughly.
- e. **Training and Awareness:** We provide regular training and awareness programs to educate employees on recognizing, preventing and addressing gender-based violence and harassment.
- f. **Performance review:** We will define and monitor specific KPIs to measure the effectiveness of our GBVH prevention efforts.
- g. **Support for Affected Employees:** We offer resources, counseling and support services for employees who have experienced gender-based violence or harassment.
- h. **Commitment to Inclusive Policies:** We integrate gender-sensitive practices into workplace policies, ensuring that recruitment, promotion and retention strategies are free from bias and discrimination.
- i. **Collaboration and Stakeholder Engagement:** We will work with external organizations, advocacy groups and industry partners to promote gender equality and strengthen workplace protections.

4. Implementation and Monitoring

We implement this policy through the following measures:

- **Risk Assessments:** We will conduct periodic assessments to identify and mitigate potential risks of gender-based violence and harassment.

- **Grievance Mechanisms:** We established and maintain confidential, accessible, secure and survivor-centred grievance reporting mechanism that ensures timely, respectful and trauma-informed response to all GBVH reports.
- **Regular Training:** We provide continuous training sessions for all employees, management and supervisors – starting with induction training and reinforced through annual refresher courses – focused on recognizing, preventing and reporting gender-based violence and harassment to enhance awareness and prevention efforts.
- **Enforcement and Investigation:** We ensure all reported incidents are thoroughly investigated and appropriate actions are taken in a timely manner.
- **Workplace Culture Enhancement:** We promote diversity, inclusion and gender sensitivity in all aspects of company operations.
- **Policy Oversight and Prevention:** The Corporate HR Manager, in coordination with the ESG Committee, is responsible for overseeing implementation of this policy, ensuring compliance and driving preventive measures, including training, risk assessments and effective reporting. They will also support continuous improvement of workplace practices to prevent GBVH.

5. Reporting and Accountability

We commit to transparency in our gender-based violence and harassment prevention efforts by issuing regular internal updates and annual public reports on policy implementation, enforcement actions, incident trends and resolution outcomes. We maintain accountability through continuous monitoring, periodic performance evaluations and active stakeholder engagement.

6. Review and Continuous Improvement

This policy will be reviewed periodically to ensure its relevance, effectiveness and alignment with evolving legal and ethical standards. We remain committed to refining our approach and strengthening protections against gender-based violence and harassment. Feedback from employees and stakeholders will be actively sought to drive ongoing improvements.

7. Conclusion

At Trans-Oil, we believe that a workplace free from gender-based violence and harassment is fundamental to employee well-being and organizational success. We are dedicated to implementing this policy with integrity, accountability and transparency, and to maintaining a safe, inclusive and respectful environment for all.

Responsibility for the successful implementation of this policy belongs to every Trans-Oil Group of Companies employee, at each level and function within the Company.

As Chairman of the Board of Directors and as being authorized for this purpose by the Board of Directors corporate resolution dated 1 July, 2025, I approve this Gender-based Violence and Harassment Prevention Policy, and I am committed to upholding it and improving our workplace safety and inclusivity measures.

Approved:

Vaja Jhashi

Chairman of the Board of Directors

1 July, 2025