

Corporate Responsible Land Acquisition and Resettlement Policy

1. Introduction

At Trans-Oil Group of Companies, we recognize that land acquisition and resettlement is a significant and sensitive aspect of our operations. We are committed to conducting all land acquisition activities in a responsible, ethical and transparent manner, respecting the rights and interests of affected communities and stakeholders.

2. Commitment to Responsible Land Acquisition and Resettlement

We are dedicated to ensuring that our land acquisition processes are fair, transparent and compliant with all applicable laws and regulations. We strive to minimize adverse impacts on communities, promote sustainable development and enhance the positive benefits of our projects.

3. Key Principles

Our Land Acquisition and Resettlement Policy is based on the following key principles:

- a. **Compliance with Laws and Regulations:** We comply with all applicable land acquisition and resettlement laws, regulations and international standards. We strive to exceed compliance requirements whenever possible.
- b. **Fair Compensation:** We ensure that all landowners and affected parties receive fair and adequate compensation for their land and any associated losses. Compensation is determined through a transparent process that considers market value and any additional factors relevant to the specific context.
- c. **Free, Prior and Informed Consent (FPIC):** We respect the principle of Free, Prior and Informed Consent (FPIC) for all land acquisitions, particularly when dealing with indigenous peoples and local communities. We ensure that affected parties have the opportunity to make informed decisions about land transactions without coercion.
- d. **Transparent and Inclusive Processes:** We conduct land acquisition and resettlement processes in a transparent and inclusive manner. This includes engaging with all relevant stakeholders, providing clear and accessible information and ensuring that all voices are heard and considered.
- e. **Minimizing Adverse Impacts:** We strive to minimize any adverse impacts of land acquisition and resettlement on affected communities and the environment. This includes conducting thorough impact assessments and implementing measures to mitigate any negative effects.
- f. **Grievance Mechanism:** We established clear and accessible grievance mechanisms to address any concerns or disputes related to land acquisition and resettlement. We commit to resolving grievances in a fair, timely and transparent manner.
- g. **Sustainable Development:** We promote sustainable development in all our land acquisition and resettlement activities. This includes considering the long-term social, economic and environmental impacts of our projects, and working to ensure that they contribute positively to local development.

4. Implementation and Monitoring

We implement this policy through the following measures:

-) **Stakeholder Engagement:** We engage with affected communities, landowners and other stakeholders throughout the land acquisition and resettlement process to ensure their concerns and interests are addressed.
-) **Impact Assessments:** We conduct thorough environmental and social impact assessments to identify and mitigate any potential adverse effects of land acquisition and resettlement.

-) **Fair Valuation and Compensation:** We ensure fair and transparent valuation of land and provide adequate compensation to affected parties.
-) **Grievance Redressal:** We establish simple and clear mechanisms for stakeholders to raise concerns and ensure prompt and fair resolution of grievances.
-) **Documentation and Record-Keeping:** We maintain comprehensive records of all land acquisition and resettlement transactions, including agreements, compensation details and stakeholder engagements.

5. Reporting and Accountability

We commit to transparency in our land acquisition and resettlement practices by regularly reporting on our performance and progress. We hold ourselves accountable to our stakeholders through continuous monitoring, evaluation and improvement of our processes.

6. Review and Continuous Improvement

This policy will be reviewed periodically to ensure its relevance and effectiveness. We are committed to continuous improvement in our land acquisition and resettlement practices and adapting to new challenges and opportunities.

7. Conclusion

At Trans-Oil, responsible land acquisition and resettlement are fundamental values that guide our actions and decisions. We are dedicated to conducting our activities ethically, transparently and in a manner that respects the rights and interests of affected communities and stakeholders, while promoting sustainable development and improving livelihoods.

Responsibility for the successful implementation of this policy belongs to every Trans-Oil Group of Companies relevant 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 Responsible Land Acquisition Policy, and I am committed to upholding it and improving our land acquisition practices.

Approved:

Vaja Jhashi

Chairman of the Board of Directors

1 July, 2025

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Group of Companies