

Human Rights Policy

Effective Date: March 1, 2023

1. Purpose and Scope.

Rowan Green Data LLC (“Rowan”) has developed this Human Rights Policy (the “Policy”) for the purpose of providing guidance as to the commitment of Rowan to respecting human rights across its supply chain and its operations. This Policy formalizes the commitment of Rowan to respect human rights. This Policy applies to Rowan and each of its affiliates. It will be subject to the interpretation of local laws and regulations in each jurisdiction in which it and its affiliates operate.

2. Policy Responsibility.

The Board of Directors of Rowan will be responsible for review, oversight and implementation of the Policy and is accountable for compliance with this Policy and its periodic revision. Implementation of this Policy will be supported by senior management. All Rowan team members are required to read and understand this Policy. In its commitment to human rights, Rowan:

- recognizes that under the UN Guiding Principles on Business and Human Rights, it has the responsibility to respect human rights in all areas of its operations;
- respects, at a minimum, internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work;
- is committed to the ten principles of the United Nations Global Compact relating to human rights, labor, environment and anti-corruption, and also supports the international agenda to abolish human trafficking, slavery, forced and child labor;
- supports equal opportunity and equal treatment for everyone in order to ensure the elimination of discrimination throughout its activities and to create a fair and inclusive workplace, engaging a workforce that reflects the local population diversity;
- will seek to enter contractual arrangements with suppliers that can comply with and promote the principles contained in this Policy and Rowan’s Supplier Code of Conduct;
- will use effort to undertake due diligence within its operations and also its supply chains in order to identify and remediate actual or potential adverse human rights impacts that Rowan may cause, contribute or be directly linked to;
- will communicate to potential key suppliers that it has a zero-tolerance policy with regards to slavery;
- will work with suppliers to assist them in their understanding of human rights and adoption of best practices to ensure respect for human rights.
- is committed to providing a workplace where all staff are treated without discrimination or harassment;
- strives to provide working conditions for its employees that are safe, healthy and respectful of human rights; and
- is opposed to and will oppose all forms of slavery, forced or compulsory labor and child labor, both within its organization and within its supply chain.

Any concerns related to human rights impacts in Rowan’s operations or in its supply chain should be reported in accordance with the Rowan whistleblowing framework. All team members are expected

to report known or suspected violations of applicable laws, regulations, policies and Rowan's broader ethical standards.

3. Remedies.

Rowan is committed to providing effective remedies where its operations cause or contribute to adverse human rights impacts. Rowan will engage directly with affected persons, and work with its business partners and other stakeholders to remediate such impacts and consider how its internal processes can be improved to prevent similar impacts in the future.