



<b>Title</b>	<b>ERG Group HSE Policy</b>	
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## 1. Introduction

With this document, the ERG Group (hereinafter also referred to as the "Group") sets out the principles and commitments it has adopted regarding Health, Safety and the Environment, promoting the continuous improvement of its performance in all areas and contexts in which it operates.

Consistent with what has already been stated in other policy documents, such as the Sustainability Policy and the Human Rights Policy, the Group confirms its respect for Health, Safety in the Workplace and the Environment (hereinafter also 'HSE'), not as mere regulatory obligations, but as essential responsibilities aimed at protecting the natural and fundamental rights of the individual.

## 2. Objectives and scope

This Policy (hereinafter also referred to as the 'HSE Policy') establishes the principles, guidelines and minimum requirements that govern the management of HSE aspects, with particular reference to:

A. Health and Safety

B. Environment

The HSE Policy applies to all Group companies, as well as to all parties working with the Group, including employees and collaborators (hereinafter "ERG Group People"), consultants, suppliers, contractors, subcontractors, business partners and other stakeholders.

Adopting behaviours consistent with the principles set out in this Policy constitutes a criterion for performance evaluation, both for the ERG Group People and for external parties engaged with the Group.

## 3. HSE Governance in the ERG Group

The management of Health, Safety and Environmental issues within the ERG Group is based on a multi-level governance system founded on principles of leadership, accountability and continuous improvement.

- The management bodies, in compliance with the applicable regulations, define HSE responsibilities, set strategies and objectives, provide the necessary resources and monitor the actions of those responsible.
- The entire organisation, under the guidance of the designated HSE leads in the various organisational and territorial contexts, is involved in implementing HSE strategies and operating in compliance with company regulations and procedures.
- The HSE&Q functions provide cross-organisational support for the proper management of HSE aspects. Specifically:

- the central HSE&Q Organisational Unit defines Group-wide HSE strategies, policies and guidelines in compliance with applicable legislation, monitors HSE performance, promotes corporate projects aimed at disseminating best practices and provides technical and methodological support to individual countries;
- the local Wind & Solar HSE&Q Organisational Units translate the global HSE strategy into concrete actions, in compliance with relevant legislation and company guidelines, and adapt them to site-specific and territorial requirements.

This structure enables the ERG Group to maintain a centralised strategic vision for HSE, while ensuring flexibility and operational responsiveness in the territories where it operates.

- Every person in the Group is an integral part of the HSE system and is expected to actively participate in prevention and improvement initiatives, adopting responsible and informed behaviours.

#### 4. Areas of intervention

The commitments below apply equally to both health and safety and environmental matters. In this context, the organisation is required to:

- ensure full compliance with applicable legal requirements, as well as with the Group's additional voluntary HSE commitments.
- take into account the Health, Safety and Environmental Management Systems adopted in the various contexts, applying the principles of international standards (ISO 45001 and ISO 14001), providing the necessary resources and ensuring that the established objectives are compatible with the context and strategic directions.
- consider workplace health and safety and environmental protection as priorities, on a par with profitability and productivity, promoting a strong sense of responsibility and awareness among personnel.
- manage HSE risks and opportunities in a systemic and proactive manner, extending risk assessment not only to ordinary operating conditions but also to potential emergency situations, and implementing all appropriate mitigation measures.
- systematically assess the organisation's environmental, health and safety performance, by defining appropriate indicators to identify areas for continuous improvement, setting clear targets and periodically reviewing the degree to which these targets have been achieved.
- promote the transparent reporting of unsafe events, behaviours and conditions in order to eliminate their causes and contribute to the improvement of work processes and environments. This reporting may be carried out through operational tools made available by the organisation (e.g. digital platforms).
- apply structured analysis tools for accidents, near misses and, more generally, all incidents, using these tools for any event that has caused or could cause harm to people or the environment.

- assess the reliability of its suppliers, contractors, subcontractors and partners, and require the adoption of management and operational practices that support the shared objective of protecting the environment and ensuring health and safety in the workplace, in compliance with contractual requirements.
- engage in active and transparent communication with stakeholders and promote the protection and redevelopment of the territory, in a manner compatible with the production process, through collaborative initiatives with communities and local authorities.

## A. Health and Safety

To protect the health and safety of ERG Group People and all those who work with or on behalf of the Group, the organisation further undertakes to:

- promote a safety culture based on exemplary behaviour, mutual accountability and active engagement, including through the implementation of 'Safety Leadership' initiatives.
- encourage employee involvement, participation, consultation and skills development by ensuring adequate resources, training and support to enable safe behaviours and informed, competent decision-making.
- establish, implement and update (as required) a process for identifying hazards and assessing risks related to all activities carried out by the Group and at all organisational levels, with the aim of preventing and mitigating such risks, and actively promoting a risk-based approach integrated into decision-making and operational processes, to ensure the protection of health, safety and the environment.
- establish, implement and maintain processes aimed at eliminating hazards and reducing health and safety risks in the workplace, according to the hierarchy of preventive and protection measures:
  - eliminate hazards.
  - replace with less hazardous processes, operations, materials or equipment.
  - implement engineering and design controls and reorganise work where necessary.
  - apply administrative controls, including training.
  - use appropriate PPE.
- manage plant modifications and the development of new projects with due consideration of safety aspects, according to the principle of continuous technological improvement, assessing potential impacts in advance.
- ensure that health and safety are never compromised, encouraging all ERG Group People and anyone acting under the Group's direction or on its behalf to stop any activity perceived as unsafe with the ultimate aim of identifying and implementing correct operating practices.

## B. Environment

The protection of the environment and biodiversity is a fundamental value of the Group's corporate culture. To this end, in addition to the commitments outlined in the general section, the Group undertakes to:

- educate, inform and train ERG Group People so that they are able to recognise and minimise the environmental impacts of the Group's activities, acting in compliance with applicable environmental legislation.
- promote awareness of the importance of individual behaviour in achieving shared environmental objectives, encouraging consultation and active participation of all workers and their representatives.
- assess in advance the direct environmental and biodiversity aspects and impacts associated with its own activities, as well as with activities of third parties over which the Group may exercise influence and control, in order to identify appropriate measures, following a hierarchy of actions that include:
  - avoiding impacts, starting from the design phase, favouring solutions that exclude interventions in protected or high-value natural areas and minimising ecosystem alterations (e.g. avoiding deforestation).
  - reducing impacts, where avoidance is not possible, by adopting technical, managerial or organisational measures aimed at minimising negative environmental effects.
  - offsetting residual impacts, only as a last resort, through suitable compensatory measures consistent with the local environmental and territorial context.
- manage plant modifications and the development of new projects with due consideration for interactions with the environment and biodiversity, in accordance with the principles of best available technologies.
- optimise the use of natural resources by promoting responsible and informed consumption, preventing pollution in energy production processes, and – where possible -reducing waste generation, implementing separate collection, recovery and recycling initiatives, and protecting water resources, ecosystems and natural habitats.

## 5. Distribution and update procedures

This Policy is communicated through the Group's internal communication channels (e.g. the company intranet) and external communication channels (e.g. the corporate website), to all the ERG Group People, as well as to consultants, suppliers, contractors, subcontractors, business partners, stakeholders and other parties that interact with the Group.

## 6. Disciplinary measures

The ERG Group shall take all reasonable measures to prevent and deter any acts that violate this Policy.

Such violations constitute non-compliance with contractual obligations and internal company rules and may result in disciplinary proceedings against the individuals involved.

In all cases, the disciplinary measures shall be proportionate to the level of responsibility of the person concerned, the intent and seriousness of the conduct, and shall respect the individual's right to appeal. These measures may be applied regardless of whether judicial or administrative proceedings have been initiated.