

Policy Prevention of Violence, Harassment and Bullying in the Workplace

Introduction

With the 22-26 ESG Plan, ERG S.p.A. ('ERG' or the 'Company') confirmed its commitment to a fair and inclusive energy transition. Every person's right to live and work in a professional environment free from violence and harassment, capable of recognising the dignity of each person, is a prerequisite for ensuring fairness and inclusion. Furthermore, the free expression, well-being and health of all is indispensable to enable full individual and collective performance, engagement and job satisfaction.

The purpose of this Policy is to prevent, detect and combat phenomena relating to violence, harassment and bullying, as well as to provide support to those reporting such phenomena (including as witnesses or because they have been informed of the facts), protecting them from any retaliatory act.

The Policy on the Management of Incidents of Violence, Harassment and Bullying in the Workplace (hereinafter the 'Policy') is based on:

- the Universal Declaration of Human Rights
- the International Labour Organisation (ILO) Convention No. 190 and Recommendation No. 206
- the UN Women and UN Global Compact Women's Empowerment Principles
- the Sustainability Development Goals of the UN 2030 Agenda, and in particular Goal 5 (hereinafter referred to as 'Gender Equality') and Goal 8 (hereinafter referred to as 'Decent Work and Economic Growth' and collectively as 'External Provisions')

as well as the internal guiding principles enshrined:

- by the ERG Group's Code of Ethics
- by the Human Rights Policy
- by the Diversity and Inclusion Policy (hereinafter collectively referred to as the 'Internal Provisions').

ERG and its subsidiaries (hereinafter referred to as 'Group Companies' or the 'ERG Group') comply with the applicable international and national regulations on the prevention of Violence, Harassment and Bullying in the workplace. ERG demands compliance with the rules set out in this Policy, even if they are more restrictive than the relevant national regulations.

Scope of application

The Policy applies to all Group Companies, to all persons who work for the ERG Group regardless of their contractual status, to Third Parties¹, to persons involved in training, including trainers, trainees and apprentices at the ERG Group, to candidates participating in the selection process in Group Companies and to any other person who comes into contact with Employees or Third Parties in the performance of their work activities (hereinafter collectively referred to as the 'Recipients').

The Policy applies:

- in every facility or office of the Group companies;
- in places intended for lunch breaks, or in places where sanitary facilities are used, or in changing rooms (if outside the aforementioned facilities or offices);
- during business travel or trips, training, events or work-related social activities (e.g., gym);
- in accommodations provided by ERG Group employers, including hotels;
- when travelling to and from work at the facilities or offices of Group companies;
- to any business communication, including those made possible by information and communication technologies (e.g., e-mail, chat, social media, video calls).

Definitions

Violence and Harassment

Any physical or verbal conduct that is intended to denigrate or show hostility and aversion towards an individual because of gender identity or expression, sexual orientation, ethnic or national origin, religion, age, disability, political opinion, physical appearance and/or social background, with the purpose or effect of interfering with work performance, living habits or personal dignity, and which may cause a general state of fear, anxiety, discomfort in the individual, such as to influence their decisions concerning employment and professional development or which is otherwise likely to create an intimidating, hostile, degrading, humiliating, offensive or uncomfortable working environment.

By way of non-exhaustive example:

- offensive and/or denigrating verbal expressions
- epithets
- outrage
- threats
- intimidation
- hostile acts
- slander
- defamatory or demeaning acts against a person's dignity and abilities
- insults
- aggression
- derision
- dissemination of confidential information relating to one's personal life
- restriction of freedom of expression

¹ Any third party cooperating with or working on behalf or in the interest of ERG such as customers, suppliers, contractors, business or industrial partners.

- any other disparaging or hostile conduct or behaviour

Gender-related violence and harassment

These are a subset of 'Violence and Harassment' and include all those unwanted behaviours related to sexual identity, expressed in physical, verbal or non-verbal form towards persons because of their gender or which disproportionately affect persons of a specific sex or gender.

By way of non-exhaustive example:

- Violence perpetrated physically and/or psychologically against a person on the grounds of their gender, gender identity or sexual orientation², as well as stalking.
- The dissemination of intimate images.

Sexual harassment

This is a subset of gender-related violence and harassment and includes any conduct with sexual connotations - expressed in physical, verbal or non-verbal form - or the threat to engage in it, whether on a single occasion or repeatedly, that is intended to cause, causes or may be perceived as causing a violation of the dignity of the harassed person or creating an intimidating, hostile, degrading, humiliating or offensive climate.

By way of non-exhaustive example:

- annoying and unwanted physical contact;
- unwanted verbal or non-verbal appreciation;
- inappropriate comments with references to a person's sexuality;
- written and verbal expression on the alleged inferiority of a person because they belong to a particular sex or denigrating them based on a diverse expression of sexuality;
- offensive, disparaging and/or inappropriate sexually motivated gestures, proposals or 'jokes';
- intrusive questions about personal relationships;
- sending inappropriate images or e-mails;
- a physical approach of a sexual nature, or the request for physical relations when the other person shows no interest;
- intimidation, threats and blackmail for rejecting behaviour aimed at sexual relations.

² 'Gender' is intended as the set of socially constructed roles, behaviours, activities and attributes that a given society considers appropriate for persons belonging to a given gender. Gender is to be distinguished from 'sex', understood instead as the sex assigned at birth, i.e., the set of physical and biological characteristics that distinguish females, males and intersex people. In fact, a person's gender identity (understood as the subjective experience of perceiving oneself as belonging to a gender) does not necessarily correspond to the sex assigned at birth: when the gender identity does not correspond to the assigned sex, mention is made of trans/transgender people. 'Sexual orientation' refers to the physical, romantic and/or emotional attraction a person feels towards other people, including but not limited to homosexuality, heterosexuality and bisexuality.

Bullying

Bullying is defined as the occurrence of verbal or physical conduct of a threatening, intimidating or humiliating nature, sabotaging or damaging a person's work performance.

Bullying damages personal and professional dignity and creates a hostile working environment. By way of non-exhaustive example:

- taunting;
- oppressive conduct;
- exclusion;
- humiliation;
- insults;
- slander;
- physical and verbal aggression;
- ostracism;
- conduct likely to create a state of embarrassment in the victim.

ERG's commitment

In promoting the dissemination of an inclusive culture focused on merit and equal opportunities also through specific training programmes, ERG adopts a **zero-tolerance** policy towards all forms of Violence, Harassment and Bullying.

The ERG Group's Code of Ethics guarantees respect for the rights of its workers and offers equal working opportunities to all, on the basis of individual professional profiles and potential performance levels, without any discrimination, condemning all harmful behaviour against individuals and pledging to adopt the most suitable supervisory measures to this end. In addition, the Policy reinforces ERG's commitment made in the Diversity & Inclusion Policy to ensure a working environment inspired by respect for equal treatment and equal dignity for all, regardless of gender, age, ethnicity, culture, ability, religion and nationality, experience, thinking style, sexual orientation and identity, political opinions and any other subjective characteristic. Respect and inclusion enable the expression of each individual's potential, are correlated with everyone's involvement and commitment, and facilitate collaboration between people.

ERG **prohibits, without exception**, all forms of Violence, Harassment and Bullying within the ERG Group, in order to ensure a working environment in which relations between colleagues are marked by loyalty, fairness, cooperation, mutual respect and trust.

ERG is committed:

- to adopting a system to monitor the causes of any behaviour attributable to Violence, Harassment and Bullying, in order to be able to identify the most effective response actions to counter such behaviour. This plan includes periodic surveys;
- to raising awareness and training the Recipients with a communication and training plan on the Policy's functioning, on behaviour associated with Violence, Harassment and Bullying and on prevention and management measures. Through Training and Internal Communication, ERG guides the dissemination of an inclusive culture where everyone can discover, enhance and share their talents to foster a work environment that enables full job satisfaction and freedom of expression;

- to protecting victims of Violence, Harassment and Bullying, protecting their privacy and excluding any retaliatory activities.

The commitment of each person

All the Recipients are required to make a commitment to act within the scope of their professional activity in compliance with the Code of Ethics and the values and principles contained therein.

Each person is asked to contribute to creating and maintaining a respectful and harmonious working environment, avoiding intimidating, hostile, degrading, humiliating or offensive words and behaviour, also in the knowledge that the perception and interpretation of words and behaviour may vary from person to person.

Participation in training on the Code of Ethics and the Policy constitutes employees' proper fulfilment of their contractual work obligations. The training programmes can also include learning assessments.

Everyone is asked to help ensure respect for the rights, worth and dignity of the individual and to promote a culture in which violence, harassment and bullying are neither accepted nor acceptable.

The People Managers must monitor employees' compliance with the Policy, disseminating its principles and taking measures to prevent potential violations.

It is also the **duty of each person to report acts, behaviour and communications that are contrary to the Policy** through the channels made available by ERG.

Third parties and employees are required, according to specific contractual provisions, to comply with the requirements of this Policy and to make their employees aware of its contents.

Reports

ERG protects victims of Violence, Harassment and Bullying, protecting their privacy and excluding any retaliatory activities.

Reports can be made by sending an e-mail to complaintharassment@erg.eu, also in anonymous form.

The report management process shall ensure the fair protection of both the reporter and the reported person; to this end, the reports shall detail the facts, events or circumstances forming the basic elements of the alleged harassment, violence or bullying and shall be made in sufficient detail to allow, using the available investigative tools, to verify whether or not the reported facts or circumstances are well-founded.

A cross-departmental commission, the composition of which will be regulated within the whistleblowing procedure currently being developed³, will work in the strictest confidentiality and will be responsible for making an assessment of the report for:

- initiating specific analyses involving the Organisational Units in question in the report;
- communicating the results of the investigations of the report in relation to the workers reported;
- activating specific protection of the reporter, guaranteeing anonymity if requested;
- guaranteeing - at least as long as the investigation phase lasts - the anonymity of the reported person, without prejudice to legal obligations and the protection of the rights of persons accused wrongly and/or in bad faith.

If the report is justified, HR will take the necessary measures against the perpetrator of the harassing behaviour.

Protection measures and penalty system

An employee who engages in or attempts to engage in conduct prohibited by the Policy, a reported and proven act of harassment or bullying, or who makes an unfounded report with wilful misconduct or gross negligence shall be subject to disciplinary proceedings in accordance with the applicable penalty system.

ERG also undertakes to provide the necessary assistance and support to all persons affected by conduct prohibited by the Policy.

Prohibition of retaliatory acts

ERG undertakes to support any victims or witnesses, to protect them from retaliatory acts and to promote an environment in which it is possible to report issues and situations deemed contrary to the Policy.

Anyone who carries out a retaliatory act against the victim or a whistleblower, including an attempt to silence the person, will be subject to disciplinary proceedings.

By way of non-exhaustive example, the following are considered retaliatory acts:

- an unjustified change in job responsibilities or duties, including an adverse action that affects the employee's remuneration or entails termination of employment;
- the unjustified denial of an opportunity for advancement;
- the intentional and unjustified exclusion from one or more meetings;
- threatening or intimidating or harassing the victim or an employee who made a report;
- the creation of a hostile working atmosphere towards the victim or an employee who made a report.

Retaliation is strictly prohibited and is a violation of the Policy.

³ Until the whistleblowing procedure is issued, reports will be managed by the Chief Audit Officer, Chief IR, ESG and Communication Officer, Chief Human Capital Officer and ICT and General Counsel.

Approval and updating

Upon the proposal of the ESG Committee and subject to the favourable opinion of the Control, Risk and Sustainability Committee, the ERG Board of Directors approves the Policy and any subsequent amendments and additions that may be necessary.

Following the proposal of the ESG Committee and having consulted the Control, Risk and Sustainability Committee, ERG's Chief Executive Officer is furthermore authorised to introduce any amendments to the Policy of a purely formal nature that do not materially alter the content of the Policy, subsequently informing ERG's Board of Directors thereof during its first appropriate meeting.

Dissemination and updating

The ERG Group undertakes to communicate this Policy to the entire organisation and to disseminate it in all Group languages via the intranet. The Policy is also published at www.erg.eu.

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