



# Policy Human Rights

ERG Group

Approved by the Boar of Directors of ERG on 13 december 2024

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## 1. Introduction

Respect for Human Rights (hereinafter also “Rights”) has always represented an essential and important element of the way the ERG Group (hereinafter also “ERG” or “the Group”) goes about its business. This is because at ERG we firmly believe that human rights are the basis of all relationships within civil society as they are considered inalienable rights of all individuals, without distinction, given that they belong to the entire human race.

Human Rights are based on the principle that all human beings have a right to dignity, freedom and equality. They were first ratified in 1948 by the UN in the Universal Declaration of Human Rights as “the foundation of freedom, justice and peace in the world”. They were subsequently included in the Declaration on Fundamental Principles and Rights at Work issued by the International Labour Organization (ILO) and in the Ten Principles of the UN Global Compact.

The ERG Group, a leading independent producer of renewable energy, has a completely sustainable development model whose business management activities are conducted in an ethical and transparent manner, respecting people and their Human Rights, protecting their health and safety, safeguarding the environment and biodiversity, and establishing relationships of trust with all stakeholders.

Integrity and honesty, moral rectitude, respect and protection, equality and fairness, transparency and confidentiality must underlie the conduct of all those who operate within or at the service of the Group.

In fact, ERG operates in the belief that:

- sustainable development should underpin its business model, geared towards improving its operating and financial results while at the same time consolidating the Group's reputation by achieving its environmental and social objectives and protecting the Rights of workers;
- the creation of 'shared value' for stakeholders is one of the main aspects of the ERG Group's sustainability profile.

## 2. References

### External references:

- the International Charter of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
- the United Nations (“UN”) Guiding Principles on Business and Human Rights, the UN's Ten Global Compact Principles and the Women's Empowerment Principles (WEPs);
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (“ILO”) and related Conventions;
- the Guidelines of the Organisation for Economic Co-operation and Development (“OECD”) for Multinational Enterprises;
- the OECD's Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- the Charter of Fundamental Rights of the European Union;
- the legislation on employment contracts applicable in the countries in which ERG operates.

### Internal references:

- ERG Group Code of Ethics;
- Sustainability Policy;
- Diversity & Inclusion Policy;
- Policy on the Prevention of Violence, Harassment and Bullying in the Workplace;
- Gender Equality Policy;
- "Whistleblowing" Guidelines;
- ERG Power Generation Health, Safety and Environmental Policy;
- ERG Group Supplier Code of Conduct;
- Anti-Corruption Policy;
- Organisation and Management Models pursuant to Italian Legislative Decree no. 231/01, adopted by the Italian companies of the ERG Group, where applicable;
- Policy for the Management of Stakeholder interactions;
- Privacy Organisation Model.

### 3. Purposes and scope of application

This Policy refers to the principles set out in the Group's Code of Ethics and aims to define the guidelines and guiding principles that promote respect and protection of Human Rights. It applies to ERG and all Group Companies, as well as to all those who collaborate with the Group, whether they are employees and collaborators (hereinafter “ERG Group People”), suppliers, contractors, subcontractors or commercial partners.

For this reason, ERG promotes its dissemination and application to all relationships with its stakeholders.

Although ERG is committed to respecting all Human Rights without distinction, this Policy is drawn up with specific reference to the business context and the location of the activities carried out by the Group's Companies.

### 4. Policy

The ERG Group protects and monitors Human Rights that affect two main areas: rights related to work practices and rights pertaining to the communities and local environments where it operates.

#### 4.1. Labour practices

In particular, the ERG Group:

- won't stand for any form of unlawful employment, illegal labour, let alone child labour, or any kind of forced labour or grunt work;
- is committed to providing healthy and hygienic working conditions, never requires employees to work excessive hours or days, and strives to ensure that workers are guaranteed adequate rest periods. The minimum wages of employees may not be lower than those established by the collective bargaining agreements and by the legislative and regulatory rules in force in the various countries;
- considers professional development and the recognition of work results as fundamental principles on which it bases its relationship with all collaborators;
- is in favour of the freedom of association and acknowledges the right of employees to engage in collective bargaining by pursuing a system of industrial relations in conjunction with trade unions that involves constant and constructive dialogue;
- respects the fundamental rights and moral integrity of all individuals;
- respects diversity and fights discrimination, promotes diversity in the workplace that might ensure equal opportunities and an inclusive work environment based on the development of skills and the active participation of each individual in company life. In both its internal and external relations, ERG rejects any form of discrimination based on age, gender, ethnic or geographical origin, religious, political beliefs, trade union affiliation, social or cultural conditions, education, disability, family circumstances, sexual and emotional orientation and generally speaking all intimate

characteristics of human beings. Diversity is considered as a potential asset from a cultural, human and professional perspective that can be enhanced through dialogue and the sharing of opinions, ideas and experiences. This commitment is implemented by providing appropriate tools such as training initiatives promoting inclusion practices and professional growth for all employees, with specific indicators used to monitor progress in these areas;

- guarantees safe and healthy working conditions, safeguards the right of its collaborators and of third parties involved in its activities to lead a full life by ensuring that all workplaces comply with all occupational health and safety requirements. The Group not only operates in compliance with current legislation; it also applies the principles of occupational health and safety management systems as required by recognised international standards and promotes a prevention policy aimed at developing a safety culture throughout the company, with the active involvement of contractors and subcontractors, which ensures that any unsafe situation or conduct is promptly reported and acted upon. The Group strives to identify, manage and reduce workplace risks so as to prevent their occurrence, with particular emphasis on the most serious ones, while also undertaking to improve its HSE processes and procedures on an ongoing basis. It provides all workers with regular training on occupational health and safety, with a special focus on emergency roles and procedures and on specific safety measures. ERG also monitors working conditions on a regular basis; any violation of occupational health and safety regulations and procedures is treated with the utmost seriousness and may lead to disciplinary measures or the termination of contracts with defaulting suppliers, contractors and subcontractors.

## 4.2. Communities and local areas

In this context, the ERG Group:

- recognises the important role played by the local stakeholders and communities in which it operates, and thus behaves responsibly, setting up relationships based on respect and trust and, where possible, on a pro-active dialogue that promotes sustainable development and the identification of jointly agreed solutions to be applied to the entire life cycle of the infrastructures and activities connected to the various business operations. ERG is also committed to paying particular attention to the more vulnerable communities<sup>1</sup>, whenever the scope of its renewable energy projects might include these geographical contexts;
- in order to protect the natural environment, the Group promotes and adopts an environmental management model designed to ensure continuous improvement,

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<sup>1</sup> From a human rights perspective, vulnerable communities include those groups that, for economic, social, cultural, political or historical reasons, are more exposed to violations of their fundamental rights. By way of example, vulnerable communities include: racial minorities, indigenous populations, refugees, asylum seekers, migrants, populations affected by conflicts.

develops and encourages the dissemination of safe technologies that minimise any environmental impact, proposes eco-friendly business solutions and sustainable development initiatives;

- it undertakes to prevent corruption by implementing a series of specific actions, control tools and procedures that it has included in its Anti-Corruption System and Policy, as well as in the Organisation and Management Model pursuant to Italian Legislative Decree 231/2001. All ERG Group People are required not to offer, promise, give, accept, allow, demand or wittingly benefit from practices that involve corruption, unlawful favours, collusive conduct, or direct and/or indirect solicitation in the performance of company activities. ERG also ensures that its People do not seek or obtain personal or career advantages for themselves or others through corruption, by providing illegitimate favours or engaging in collusive conduct.
- respects its stakeholders' right to confidentiality and privacy and undertakes to use personal data and information correctly. In more specific terms, it undertakes to process personal data and information in compliance with fundamental rights and freedoms, to safeguard the dignity of the data subjects, with special emphasis placed on their confidentiality, personal identity and the protection of their personal data. The ERG Group guarantees that personal data are processed lawfully and in accordance with the regulatory provisions in force, ensuring, in particular, that the data is processed exclusively for the stated and pursued purposes. To this end, the Group has adopted a Privacy Organisation Model designed to protect the data subject and guarantee the correct application of the legislation on personal data protection.

## 5. Implementation and updates

ERG verifies the effectiveness of the approach adopted mainly through i) a structured process of identification, assessment and management of risks within the context of Human Rights; ii) tools that monitor and assess the process adopted on a regular basis; iii) open dialogue with all stakeholders so they may report any violations.

In carrying out the aforementioned activities, ERG takes care to ensure that worker's rights are upheld, with particular attention paid to those of minors, migrants and other vulnerable persons and/or those at risk of discrimination or violence in any form. In particular, the Group's risk management model envisages:

- the identification of suppliers, contractors, subcontractors and business partners who may present risks related to Human Rights, assessing parameters such as: geographical areas of operations and type of activities performed;
- the performance of audits, carried out based upon the Group's internal procedures, in the areas identified as being at greatest risk, which may also include the possibility of carrying out audits - remotely or on site - on suppliers, contractors, subcontractors and commercial partners;

- the definition of plans of action, to be shared with suppliers, contractors, subcontractors and commercial partners, which may include activities designed to broaden, review and strengthen company procedures and controls along with specific training and awareness-raising actions related to Human Rights.

With the aim of extending the application of its principles even outside the Group, ERG requires all suppliers, contractors, subcontractors and commercial partners to buy in to the Code of Ethics, the Supplier Code of Conduct and the General Principles of this Policy.

This Policy is approved by the Board of Directors of ERG S.p.A. based on advice provided by the ESG Committee and the Control, Risk and Sustainability Committee.

This Policy is reviewed on a regular basis to assess its adequacy and to define any changes to be made and/or actions for improvement that might be required.

## 6. Disclosure, communication and training

This Policy is disseminated via the Group's internal (e.g. company intranet) and external (website) communication channels, to all the ERG Group Personnel and to suppliers, contractors, subcontractors and commercial partners, to the stakeholders and to all other parties that have relationships with the Group.

The Group drafts and implements training programmes that focus on the protection of Human Rights, the contents of this Policy and the Regulatory provisions, so as to ensure the dissemination and correct understanding of the principles and raise awareness of these issues among ERG Group Personnel.

## 7. Reporting of violations

The ERG Group ensures that violations of the Code of Ethics and the Supplier Code of Conduct may be reported and especially those offences that constitute - or may constitute - a violation of Human Rights and/or of this Policy.

In particular, if a person included among the Personnel of the ERG Group, its suppliers, contractors, subcontractors, commercial partners, customers and, more generally, all Stakeholders of the ERG Group has a reasonable suspicion that a violation has or may take place, said person must report it via the ERG Group's whistleblowing platform, which can be accessed at the address <https://erg.integrityline.com/frontpage>, using any browser, even on a mobile device.

The sending, receipt and management of Whistleblowing Reports (including the protections afforded to whistleblowers) are governed by the "Whistleblowing" Guidelines adopted by the ERG Group.



## 8. Sanctioning system

The ERG Group takes all reasonable measures to prevent and discourage any acts that may violate Human Rights and/or this Policy.

Such violations constitute a breach of contractual obligations and Internal Regulations and may give rise to the opening of disciplinary proceedings and the implementation of penalties against the respective perpetrators.

More specifically:

- employees of ERG Group Companies are subject to the penalties envisaged by the National Collective Labour Agreement (or equivalent document) applicable at the time, as applied by the Human Resources organisational unit;
- members of the management and control bodies of ERG Group Companies are subject to removal from office following a decision by the relevant shareholders' meeting;
- suppliers, contractors, subcontractors and commercial partners are subject to the penalties envisaged by the agreements stipulated with the ERG Group Companies, which may lead to the suspension or, in the most serious cases, to the termination of the contractual relationship.

In all cases, the penalty must take into account the degree of liability of the party involved as well as the intentional nature and the seriousness of the sanctioned conduct, without prejudice to the party in question's right to a hearing. Said penalties may be imposed even if the conduct in question results in action being taken by the Authorities

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