

HUMAN RIGHTS POLICY

1. Introduction

During 2017, the ERG Group completed a widespread process of transforming from an important private Italian oil operator to a leading independent player in the production of energy from renewable sources (wind, solar and hydroelectric) with a growing presence abroad.

In light with its 80-year industrial history, also in this process of change, respect for human rights was an essential and crucial element of ERG's way of doing business. This is because ERG firmly believes that human rights underlie all relationships in civil society, as they are inalienable rights of all individuals, with no distinctions, due to the fact that they are human beings.

Human rights are based on the recognition of the dignity, freedom and equality of human beings, and were sanctioned for the first time in 1948 by the UN, in the Universal Declaration of Human Rights as the "foundation of freedom, justice and peace in the world". Subsequently, they were 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 United Nations Global Compact.

2. Goals and scope of application

Compliance with this Policy is required from all those who work with the ERG Group, as employees and as suppliers, contractors or business partners. For that reason ERG promotes its diffusion and application in relations with its stakeholder.

Though ERG commits equally to complying with all human rights without any distinctions, this Policy has been drawn up with specific reference to the business scenario and location of the activities conducted by Group Companies.

3. Policy

In addition to the indications set out in the Universal Declaration of Human Right, the on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact, this Policy is also based on the principles set out in the Group Code of Ethics, the Organisation and Management Models pursuant to Legislative Decree No. 231/2001, as well as the legislation regarding labour agreements applicable in the countries in which ERG operates.

In particular, the ERG Group:

- does not tolerate any type of illegal work, "off-the-books" work or child labour, forced labour or brutal work;
- pledges to guarantee healthy and hygienic working conditions, not to request excessive work in terms of working hours and days, and to guarantee adequate rest.

The minimum salary of employees cannot be lower than that set in the national collective labour agreements and the legislative and regulatory treaties in force in the various countries;

- promotes professional development and the recognition of results of work as fundamental principles on which to base its relationship with workers;
- is aware of the importance of guaranteeing adequate protection to data subjects whose personal data is processed and respects the right to privacy of all of its stakeholders, committing to correctly use the data and information provided;
- guarantees the freedom of association and effective recognition of the right to collective bargaining, sharing with the trade union organisations a system of industrial relations based on an ongoing, constructive dialogue;
- respects the fundamental rights of people, protecting their moral integrity and guaranteeing equal opportunities. In internal and external relations, no discriminatory conduct is permitted based on political or trade union opinions, religion, race, nationality, age or sex, sexual orientation, health status or in general, any intimate personal characteristics. Diversity is considered to be a cultural, human and professional opportunity, through dialogue and sharing of opinions, ideas and experiences;
- protects the right to life of both its workers and third parties involved in its operations, focusing its attention on the health and safety in workplaces. The Group not only operates in compliance with legislation, but applies health and safety management systems that comply with international standards and promotes a policy of prevention, focused on developing a culture of safety at all levels of the company, with high standards of assessment, prevention and management of the related risks.

To protect the natural environment, ERG promotes and adopts an environmental management model focused on continuous improvement, develops and encourages the dissemination of safe technologies that minimise environmental impacts and proposes eco-compatible business solutions and sustainable development initiatives.

ERG pledges to prevent corruption, which may also have significant impacts on human rights, through a series of specific actions, control instruments and procedures, which it has included in its Organisation and Management Model pursuant to Legislative Decree No. 231/2001. Collaborators of the ERG Group must refrain from offering, promising, giving, accepting, condoning, demanding or gaining benefits in an informed manner from practices of direct and/or indirect corruption, unlawful favours, collusive conduct in carrying out company business. ERG also ensures that its employees shall not gain personal or career benefits for themselves or for others through practices of corruption, unlawful favours or collusive conduct.

4. Implementation and monitoring

The monitoring and effective implementation of this Policy and the management of reports of non-compliance herewith are delegated, for the entire Group, to the Human

Capital Committee, which can be contacted through the Chief Human Capital Officer who acts as the Secretary of the Committee.

The Human Capital Committee verifies and ensures that those who submit a report in good faith are not subject to any type of retaliation, discrimination or penalisation, and ensures that the confidentiality of their identity is protected, save for obligations of law and the protection of the rights of the Company or persons accused erroneously and/or in bad faith.

The Human Capital Committee shall assess the reports received in a professional and responsible manner. It may hear testimony from the reporting party and/or the perpetrator of the alleged violation, providing written justification for its autonomous decision not to continue, if any. Any detailed anonymous reports (containing all the objective elements required for the subsequent phase of verification) shall be taken into consideration by the Human Capital Committee for investigation.

December 2018

Executive Vice President

Alessandro Garrone



Chief Executive Officer

Luca Bettonte

