



# HUMAN RIGHTS POLICY

Approved by the Board of Directors of A2A S.p.A.

July 8, 2021

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## 1. INTRODUCTION

### **1.1 FOREWORD: A2A'S COMMITMENT TO RESPECT HUMAN RIGHTS**

A2A S.p.A., as well as all the companies belonging to the A2A Group (hereinafter the "Group"), with the aim of supporting and promoting respect for inviolable human rights, are committed to ensuring that their professional relations with all their stakeholders are based on respect for human dignity and the fundamental guarantees recognized for all people by national and supranational laws.

This Human Rights Policy (hereinafter also referred to as the "Policy") has been adopted by the Board of Directors of A2A S.p.A., in addition and as a complement to the Group's Code of Ethics, in order to reaffirm the commitment of all Group companies to the promotion and support of all the values and principles established by international human rights institutions and conventions of which the A2A Group is a member.

In particular, the Group protects and promotes acknowledgement and fostering of dignity, liberty, and equality of mankind, the protection of labour and the freedom of unions, the protection of health, safety, the environment, the safeguarding of biodiversity, as well as the set of values and principles relating to circular and efficient use of resources and sustainable development.

Any type of discrimination, corruption, slave or child labour is disavowed. In that respect, the Group works within the reference framework of the Declaration of the Universal Rights of Man, the fundamental treaties of the ILO – International Labour Organization – and the OECD Guidelines for Multinational Companies.

Moreover, the A2A Group is a member of Global Compact, the United Nations initiative for promoting the culture of business citizenship, which encourages companies throughout the world to create an economic, social and environmental framework able to ensure a sound and sustainable world economy, respectful of universal principles regarding human rights, work, the environment and the fight against corruption.

In this context, the Group is committed to providing all its employees with a positive and stimulating working environment, free from discrimination, ensuring that everyone's dignity, rights, cultural and individual diversity are recognized, respected and valued, with the aim of creating a strong Group culture.

The values and principles represented in this Policy are the cultural heritage of the Group and are disseminated and implemented at all levels through a commitment to organizing specific awareness and training programmes.

A2A group takes steps to ensure such standards are disseminated as far as possible, both inside and outside the company walls. To this end, it also makes this Policy available to its external

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associates, partners and vendors, and identifies the groups of people who are most at risk of being impacted by the Company's activities, promoting a commitment to respect human rights throughout the value chain adopted and the implementation of projects aimed at supporting those who find themselves in particularly vulnerable economic and social situations.

The Group is also committed to actively cooperating with public and private authorities in the implementation of human rights programmes, contributing to dedicated initiatives and networks at local, national or international level.

## **1.2 REFERENCE REGULATORY FRAMEWORK**

This Policy presumes compliance with applicable law and the voluntary codes the A2A Group has decided to follow, as well as precise compliance with all company rules and regulations.

### **1.2.1 National and international regulatory framework**

The A2A Group applies and promotes the founding principles of the following conventions and declarations of international and European law:

- United Nations (UN) International Bill of Human Rights:
  - a) Universal Declaration of Human Rights, 1948;
  - b) International Covenant on Civil and Political Rights, 1976;
  - c) International Convention on Economic, Social and Cultural Rights, 1976;
- European Convention on Human Rights, 1950;
- UN Convention on the Rights of the Child, 1989;
- Fundamental Conventions of the International Labour Organization (ILO): for example, nos. 29/1930, 87/1948, 98/1949, 100/1951, 105/1957, 111/1958, 135/1971, 138/1973, 182/1999;
- Declaration on Fundamental Principles and Rights at Work, 1998;
- European Parliament resolution of 10 March 2021 with recommendations to the Commission on due diligence and corporate responsibility.

In addition, the Group follows the following private sector standards and voluntary initiatives, in their most up-to-date editions:

- United Nations (UN) Global Compact Principles, 1999;
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2011;

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- ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, 1977;
  - Guiding Principles on Business and Human Rights: implementing the UN “protect, respect and remedy” framework, 2011;
  - International Standard Social Accountability 8000 (SA8000), 1997;
  - Guidelines (OECD) for Multinational Enterprises against Slavery, 2020;
  - WBCSD CEO Guide to Human Rights, 2020.

Finally, the A2A Group complies with the regulations in Italy and in the countries in which it operates or may operate, such as, by way of example but not limited to:

- Laws on equal opportunities between men and women;
- Legislative Decree 231/2001 on the subject of the administrative liability of entities;
- Anti-Corruption laws;
- Laws relating to trade union freedom and activity in the workplace;
- Laws relating to health and safety in the workplace;
- Working time laws;
- Environmental laws;
- Privacy and personal data protection laws.

### ***1.2.2 Internal regulatory framework***

The A2A Group has adopted a number of internal regulatory instruments designed to support companies in ensuring that they manage their activities in an effective, efficient and transparent manner and in compliance with the principles and values expressed in this Policy. Among the internal regulatory references mentioned, the following should be noted in particular:

- Code of Ethics;
- Charter for equal opportunities and equality at work;
- Quality, Environment and Safety (QES) Policy;
- Quality, Environment and Safety (QES) Management System;
- A2A Anti-Corruption Policy;
- A2A Group Sustainability Policy;
- A2A Group Security Policy;
- A2A Group Enterprise Risk Management Policy;

- A2A Group Integrity Pact;
- Organization, Management and Control Model pursuant to Legislative Decree 231/2001 of A2A S.p.A. and individual Group companies;
- A2A Group organizational and privacy management model;
- Other relevant internal regulatory documents governing the Company's operations (e.g. Health, Safety and Environment, Supply Chain, Selection, recruitment and management of Human Resources, Management of reports, Social Responsibility, Privacy).

### **1.3 PURPOSE AND SCOPE OF APPLICATION**

The A2A Group Human Rights Policy, approved by the A2A S.p.A. Board of Directors, aims to define those fundamental ethical principles, the rules of conduct, as well as the responsibilities regarding human rights that the A2A Group recognizes, respects, and takes on as a cardinal value, binding on all Recipients of the Policy.

This Policy applies to all A2A Group personnel and to all those who work for or on behalf of Group companies, within the scope of their activities and within the limits of their responsibilities, including the members of the Corporate Bodies.

The Policy shall apply to activities carried out by the Group companies abroad, albeit whilst taking into account the regulatory, social, economic, and cultural differences of that context.

### **1.4 RECIPIENTS**

The set of ethical principles, values, and rules of behaviour set forth in this Policy shall inform the activity of all those working either inside or outside the Group's sphere of action (hereinafter, the "Recipients").

In particular, by way of example, the following are Recipients of this Policy:

- **Members of the Board of Administration**, who shall hew to the principles of the Policy as they set company objectives;
- **Members of the Supervisory Board**, who ensure compliance with and observance of the Policy's content in the exercise of their duties;
- **Executives**, who shall provide concrete evidence of those values and principles contained in the Policy, bearing the responsibility for the same both internally and externally;
- **Employees**, who, in accordance with applicable law, shall conform their actions and behaviour to the principles, objectives, and undertakings set forth in the Policy;

- **Associates**, who, on an ongoing basis (consultants, agents) shall conform their conduct to the principles underlying the Policy;
- **Group vendors and commercial partners** registered in the register or with an active contract.

### **1.5 RECIPIENTS' DUTIES**

All Recipients shall be responsible - to the extent their job duties require - for complying with the Human Rights Policy. In particular, all actions, operations, negotiations and, in general, the conduct of Recipients in the performance of their work must be based on the principles and values expressed in this Policy, and must be open to checks and controls in accordance with current regulations and internal procedures.

Furthermore, persons in a supervisory and coordination role shall be required to supervise compliance with the Policy on the part of their own associates, and to adopt suitable measures for preventing, identifying, and reporting potential violations.

All Recipients are required to read, understand and fully comply with this Policy, which is available on the corporate Intranet and on the A2A institutional website.

All Recipients shall be required to abide by, and to the extent their duties require it, have others abide by, the principles contained in the Policy: under no circumstances can the end of "acting in the interest of Group companies" justify a means that conflicts with appropriate conduct as defined herein, and more generally with any law, regulation, or rule applicable.

## **2. PRINCIPLES**

The fundamental principles on human rights identified below are an expression of the values in which A2A believes and on which the Group's corporate culture is based.

These values express the standard of conduct required of all employees and associates of A2A Group companies.

### **2.1 WORKING PRACTICES**

#### **2.1.1 Refusal of forced or compulsory labour and child labour**

The A2A Group undertakes to promote the effective elimination of all forms of forced or compulsory labour, as defined by ILO Convention no. 29, as well as all forms of exploitation of workers, including any form of abuse, coercion or psychological and physical violence, both with respect to its own employees and to workers employed along the supply chain, and strongly condemns the trafficking and exploitation of human beings in all its forms.

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The Group also rejects the use of child labour, as defined by the legislation in force in the country where the activities are carried out and, in any case, not less than the minimum age established by ILO Convention no. 138<sup>1</sup>.

### ***2.1.2 Respect for diversity, non-discrimination and equal opportunities***

The A2A Group respects the fundamental rights of all people, protecting their moral integrity and guaranteeing equal opportunities. In both internal and external relations, no conduct is allowed that has discriminatory content based on political and trade union opinions, religion, gender, ethnicity, nationality, age, sexual orientation, state of health, family responsibilities and in general on any characteristic of the human person. The Group considers diversity to be an opportunity and a cultural, human and professional resource, to be enhanced through dialogue and the exchange of opinions, ideas and experiences.

To this end, the Group has adopted both the "Charter for equal opportunities and equality at work" as a commitment to achieving the objectives of equal opportunities, dignity, equality at work and a contribution to the fight against all forms of discrimination, and the "Utilitalia Pact - Diversity makes the Difference", as well as adhering to the Manifesto promoted by "Valore D", aimed at promoting female employment and gender equity as a factor of innovation and growth for companies.

The Group has also defined and implemented company policies that provide for the involvement of all levels of the organization in the respect of these values, and promotes the organization of training and awareness initiatives on the subject of diversity and the dissemination of an inclusive culture that enhances the principle of equal treatment of all employees on the basis of their professional skills and abilities.

Particular attention is paid to the development of innovative welfare policies aimed at promoting the well-being of employees and the reconciliation of private and professional life, as well as compliance with regulations to safeguard protected categories.

### ***2.1.3 Commitment against harassment and bullying in the workplace***

The A2A Group is committed to ensuring a correct and professional working environment for all its workers, whatever the type of relationship established and the role they hold.

Gender-based harassment, as discrimination based on sex, strikes at the core of human dignity and violates the principle of equal treatment between persons.

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<sup>1</sup> This is the ILO "Minimum Age Convention", which currently provides for a minimum age of 15.

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Sexual harassment is a subset and represents an even more serious form of sexual harassment, characterized by damaging behaviour (verbal insults, humiliation, intimidation, expressions of contempt, disparaging comments, vulgar proposals, and even unwanted physical contact) directed at a person.

The A2A Group also considers as harassment any initiative that takes the form of threatening retaliation following a negative response to a verbal and/or physical approach, as well as any single isolated act, even if not repeated, that is undesirable for the person subjected to it.

The Group rejects and condemns harassment in all its forms, and considers it even more serious when it is used, implicitly or explicitly, to exert pressure in the case of the hiring of an employee, or in the case of decisions concerning the professional future, or when it has the purpose or effect of unreasonably interfering with the employee's professional performance or creating an intimidating, hostile, humiliating or offensive working environment.

The A2A Group is therefore committed to spreading knowledge and awareness on the subject of harassment in the workplace, in order to strengthen the culture of respect and to counter any behaviour contrary to these values, as well as to foster confidence in the prevention and regulation system proposed.

With this objective, the A2A Group promotes the enhancement of the real and non-stereotypical representation of roles in full respect of cultural and professional dignity, also in order to remove the obstacles which in fact limit equal opportunities, undertaking to encourage training and awareness initiatives on this subject.

The A2A Group undertakes to promote and implement working methods designed to achieve greater organizational well-being, as well as to ensure respect for the professional dignity and psychological and physical integrity of employees in relation to the individual personality of each. In this regard, the Group requires that in internal and external working relationships no intimidating conduct or attitudes that can be related, even in a concealed form, to mobbing practices should take place; such conduct is prohibited without exception. The following are considered as such: creating an intimidating, hostile, isolating or in any case discriminatory working environment towards individuals or groups of workers; creating unjustified interference with the performance of work by others; hindering the individual work prospects of others for mere reasons of personal competitiveness. To this end, the Group promotes the values of diversity and inclusion in the belief that cooperation between people with different cultures, skills, perspectives and experiences is a fundamental element in ensuring entrepreneurial growth and innovation.

The Group is committed to ensuring that there are no hidden forms of mobbing, by monitoring, also through surveys, the company climate with regard to the issues dealt with.

Any Group employee or associate who sees or is subjected to mobbing or harassment practices as described above is required to report them to their superior, or to report it to the competent organizational structures according to the procedures described in the dedicated paragraph of this Policy (Ref. "Whistleblowing system and principle of non-retaliation").

In order to monitor concrete compliance with this aspect of the Policy, reports received from Recipients on any violations that have occurred are assessed, in line with as described in the dedicated paragraph. In response to such reports, if the defined conditions are met, the Group undertakes in-depth investigations, at the outcome of which, if it is confirmed that harassment or intimidating practice has actually taken place, corrective action may be taken, as well as disciplinary action. The Group also guarantees the involvement of the hierarchical managers in the management of the protection of the offended parties. They have the duty to promote the prevention of the practices described above in the workplaces where they carry out their functions and to assess and initiate the prescribed disciplinary procedures; moreover, in the event of conduct that could constitute intimidation or harassment, without prejudice to the assessment of the initiation of the prescribed disciplinary procedures, they have the obligation to take and promote the organizational and management measures considered most appropriate in order to avoid the repetition of similar situations.

#### ***2.1.4 Freedom of association and collective bargaining***

The A2A Group guarantees freedom of association and effective recognition of the right to collective bargaining, sharing with trade union organizations a system of industrial relations based on constant and constructive discussion.

#### ***2.1.5 Occupational health and safety***

The A2A Group is committed to ensuring high standards of health and safety at work, promoting the consolidation of a culture of safety through the adoption of responsible behaviour and awareness of operational risks by all employees and associates, including through specific information, training and awareness raising activities.

In accordance with the principle of respecting the person, and pursuant to any legal provision as may from time to time apply, the Group ensures the creation and the maintenance of a salubrious and safe working environment for all employees. Workers shall contribute to safeguarding their own safety, and that of others, by abiding by the standards and regulations contemplated in that arena, and by promptly reporting to their supervisor any situation representing a danger to themselves or to another.

### ***2.1.6 Adequate working conditions***

The Group undertakes to require work in compliance with the provisions of the law and collective bargaining in force in terms of working hours and days worked, and to guarantee adequate rest and fair remuneration to all employees.

In particular, remuneration takes into account the principle of fair compensation for work and equal pay for women and men for work of equal value, based on objective assessment. The minimum wage of A2A employees may not be lower than as established by collective agreements and the relevant legislative and regulatory treatments in force, in line with the provisions of the ILO Conventions.

## **2.2 COMMUNITY AND SOCIETY**

### ***2.2.1 Respect for local communities***

The A2A Group undertakes to respect the rights of local communities and to contribute to their realization, promoting local development.

As part of its activities, the Group is committed to contributing to the development and well-being of the community in which it operates, guaranteeing respect for the needs of the territory, with the aim of interpreting its needs also in terms of attention to employment levels, and investing in research and development of efficient and advanced technologies that allow services to be provided according to the highest standards of sustainability from an environmental and energy point of view.

In particular, the experience gained at the service of local communities and the awareness that the Group's activities involve a high level of territorial, social and environmental interaction have enabled A2A to consolidate a relationship with its communities based on listening, continuous dialogue and the active involvement of its stakeholders, a source of valuable information and ideas for understanding the needs of the local areas and responding to them effectively, anticipating any critical issues.

The variety of stakeholder categories involved in the company's initiatives encourages the sharing of different experiences and points of view in order to improve the services offered to communities and the quality of life in the areas where the Group operates.

### ***2.2.2 Protection of the environment***

The A2A Group promotes and adopts an environmental management model aimed at continuous improvement, implementing eco-compatible solutions designed to minimize the risks associated with global warming, pollution and the depletion of resources and encouraging sustainable development initiatives. Within the scope of its activities, the Group is attentive to the consequences of its choices on the environment and the territory, and is committed to

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contributing to the creation of a local, national, global and environmentally sustainable economy, capable of reducing environmental impact through innovation, progress and circularity. The Group is also committed to promoting environmental education among its employees and associates and in the areas where it operates.

### ***2.2.3 Fight against corruption***

The A2A Group recognizes corruption as one of the factors undermining institutions and democracy, ethical values and justice, and the well-being and development of societies and therefore rejects it in all its direct and indirect forms.

It therefore prohibits all forms of corruption without exception, both in relations with private individuals and in relations with the Public Administration, which must be based on the utmost transparency and fairness.

In its commitment to the fight against corruption, the A2A Group has adopted a specific Anti-Corruption Policy, which provides a systematic framework of reference for combating corruption and disseminates, inside and outside the Group, the principles and rules to be followed to prevent and counter corrupt conduct of any kind, whether direct or indirect, active or passive, including in the form of instigation, in accordance with the provisions of the applicable anti-corruption legislation.

### ***2.2.4 Privacy and confidentiality***

The A2A Group respects the right to confidentiality and privacy of its stakeholders, and is committed to the correct use of the personal data and information provided to it.

In particular, it undertakes to process personal data and information in respect of fundamental liberties and rights, and the dignity of data subjects, with specific reference to the confidentiality, personal identity, and protection of personal data.

The Group guarantees that personal data is processed lawfully and in accordance with the provisions of current regulations, ensuring, in particular, the relevance of data processing to the stated and pursued purposes.

For said purpose, the Group has adopted an organization and management model for personal data and procedures to protect the data subject and guarantee the correct application of the legislation on the protection of personal data.

### ***2.2.5 Security activities***

The A2A Group undertakes to manage security activities in compliance with current legislation and international standards on human rights.

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Policies and preventive measures are in place to protect personnel with respect to the information they handle and their use of company assets exposed to a security risk.

### ***2.2.6 Digital inclusion and access to innovation***

The A2A Group promotes digital, social and geographical inclusion and supports the spread of new smart and digital technologies.

In particular, in line with the A2A "Life Company" purpose, A2A Smart City has the objective of "transforming cities and businesses by making them more intelligent, connected and sustainable, improving them together with their citizens and employees through active involvement, thanks to the adoption of innovative technologies and the aware use of data".

In this context, the Group promotes innovation, developed jointly with universities, research centres and start-ups, in order to continuously develop new services that are useful and functional to improving the quality of life of people and communities.

## **3. HUMAN RIGHTS RISK ASSESSMENT AND MANAGEMENT**

The A2A Group constantly assesses and monitors its actual and potential impacts on human rights and is committed to improving the effectiveness of its action to prevent the risk of incurring practices that violate human rights, as well as to ensure effective management and mitigation of any negative impacts it may have contributed to causing in the course of its activities.

In particular, the Group identifies and assesses its human rights risks as part of the Enterprise Risk Management ("ERM") process implemented in accordance with the "Guidelines for the Internal Control and Risk Management System", approved by the Board of Directors of A2A S.p.A. and adopted by Group companies, as well as in accordance with the Policy prepared by A2A on Enterprise Risk Management.

The ERM method calls for the definition of a risk model that includes, among other things, the types of risks related to occupational health and safety, human resource management, the supply chain, compliance, current regulations, governance, the environment and climate change.

Human rights are also the subject of a specific assessment as part of the materiality analysis set out in the A2A Integrated Financial Statements - Consolidated Non-Financial Statement, prepared in accordance with Legislative Decree 254/2016. In this context, the materiality of human rights is assessed, both for the A2A Group and for its stakeholders, and the risks and opportunities associated with promoting and respecting human rights throughout the value chain (employees, vendors, customers) are analyzed, as is the promotion of appropriate mechanisms and procedures for reporting irregularities and unlawful conduct or conduct that is in any case contrary to the A2A Group's procedures and policies.

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Fully in line with European guidelines on sustainable finance, the A2A Group includes specific ESG performance indicators in its risk analysis processes for third parties in order to pursue an increasing improvement in investment choices.

The Group is committed to spreading, at all levels, an internal culture characterized by awareness of the existence of potential risks of violation of human rights, as well as the importance of compliance with the relative prevention measures contained in company policies and procedures.

## **4. IMPLEMENTATION AND SUPERVISION**

It is the primary responsibility of the directors and managers of the companies belonging to the A2A Group to give concrete form to the principles and contents of this Policy and to set an example by their own conduct to their associates, both inside and outside the Group, in order to ensure the spread of the ethical culture, based on respect for and protection of human rights, promoted by A2A.

### **4.1 SUPERVISION OF OWN BUSINESS RELATIONS**

The Group adopts policies for the selection of its vendors, associates and business partners based on fair, transparent processes that comply with applicable laws, and strives to ensure responsible management of the value chain, based on the respect and promotion of human rights and the principles underlying this Policy.

#### **4.1.1 Rules of conduct with respect to vendors and external associates**

In order to minimize the risks of human rights violations in its supply chain, A2A vendors and external associates must meet certain minimum requirements and are subject to assessments, for example, to check compliance with labour legislation, also relating to child labour and the health and safety conditions of workers.

Furthermore, the Group requires its vendors and external associates to adhere to the Integrity Pact, which provides for the obligation to respect the principles underlying the Policy and the other rules of conduct adopted and communicated, and adopt specific measures in the event of violation of the same, including the possible termination of the contractual relationship.

To this end, the structures responsible for the corporate functions undertake to monitor compliance with this Policy in the performance of the activities envisaged in the contracts by vendors, in particular with regard to child labour and the health and safety of workers.

The Group shall notify vendors and external associates of the content of this Policy, by making it available to the same on the A2A website.

#### ***4.1.2 Rules of conduct with respect to commercial partners***

The A2A Group shall develop partnership relationships with counterparties with proven reputation and expertise, conducting such interactions in accordance with applicable law and the guiding principles of this Policy. The Group's commercial partners must adhere to the entire contractual documentation submitted by the Companies, including the obligation to comply with the aforementioned principles and the other rules of conduct adopted and communicated for this purpose, which provide for the assumption of specific measures in the event of violation, including the possible termination of the contractual relationship.

#### ***4.2 WHISTLEBLOWING SYSTEM AND PRINCIPLE OF NON-RETALIATION***

All stakeholders may report, even anonymously, through the existing reporting channels, any violation or suspected violation of the Human Rights Policy.

Reports may also be sent verbally, as well as by ordinary mail and by e-mail, to the contact addresses published on the A2A website.

In the event of any report, the absolute confidentiality of the identity of the reporting party in good faith is guaranteed, ensuring the protection from any form of retaliation, discrimination or penalization against them during and after the inspection activity.

Failure by employees to report known or suspected illegal action of which they have become aware may result in the application of disciplinary sanctions.

#### ***4.3 PENALTY SYSTEM***

The A2A Group shall undertake all reasonable steps to impede any conduct that might breach this Policy, and to interrupt or penalize any contrary conduct carried out by any employee, partner, or third party generally acting on the Group's behalf.

Violation of the principles expressed in this Policy by employees damages the relationship of trust established between employees and the company of which they are part and may lead to disciplinary action and compensation. In such cases, the Group undertakes to implement appropriate provisions in order to adopt the most appropriate measures provided for by law.

With respect to Recipients other than employees (vendors, commercial partners, consultants, and anyone who has entered into collaboration of any kind with the Company), the Group shall include in all related contracts a termination provision for any behaviour or action contrary to the principles and values contained in the Policy.

The restriction against discrimination and retribution as against any good-faith whistleblowing shall remain.

## **5. COMMUNICATION AND TRAINING**

The A2A Group undertakes to promote and ensure adequate awareness of the Policy by disclosing it to interested parties through appropriate and adequate communication activities, using suitable tools to reach the entire corporate population, such as, for example, publication on the corporate Intranet for employees and publication on the A2A website for consultants, agents, vendors and commercial partners.

In addition, in order to ensure that this Policy is properly understood by all its Recipients and to guarantee continuous awareness of the values and principles it contains, the Group undertakes to guarantee an adequate training programme.

## **6. REVISION AND UPDATE**

The A2A Group's commitment to human rights is regularly updated in order to take account of changes within Group companies as well as the external context, making the most of advances in human rights standards and practices.

This Policy is updated by and under the responsibility of the Compliance 231 organizational structure of A2A S.p.A., on the basis of the indications provided by the competent corporate organizational structures.

Each revision of this Policy is also subject to approval by the Board of Directors of A2A S.p.A.