



# Human rights protection policy

## Contents

<b>Scope and target</b>	2
<b>Regulatory framework of reference</b>	2
<b>General principles and best practices in labour rights, community and territorial rights, management of activities</b>	3
<b>Roles and responsibilities</b>	6
<b>Monitoring of risks, monitoring and management of reports and defaults</b>	6
<b>Communication, review, and document updates</b>	7



## Scope and target

In keeping with and in addition to its Code of Ethics, Edison considers respect for human rights a prerequisite that applies to all of its operations and will not tolerate any violations in this area, either by its own people in the exercise of corporate activities or by suppliers, subcontractors or partners.

Human rights are an integral part of Edison's *Sustainability Policy* and materiality perimeter, the latter being defined through consultation with internal and external stakeholders. They are also directly linked to some of the United Nations Sustainable Development Goals (SDGs), to which the company is committed to contributing: no. 5 "*Gender equality*", no. 8 "*Decent work and economic growth*" and no. 10 "*Reducing inequalities*".

As a member of the UN Global Compact<sup>1</sup>, since 2005 Edison has been contributing to the promotion of a healthy and sustainable world economy that respects the Ten Universal Principles<sup>2</sup> in the fields of human rights, labour, the environment and the fight against corruption. Therefore, recalling its adherence to them, for the purposes of this document, Edison reiterates in particular its commitment with respect to the first two: I) to promote and respect universally recognised human rights within its sphere of influence II) to make sure it is not complicit, even indirectly, in human rights abuses.

The monitoring and protection of human rights is a cross-cutting issue in the management of business activities and people; in terms of relevance to its value chain, Edison identifies as the main human rights connected with its activities those related to the personal sphere - including dignity, freedom and equality of human beings -, labour, the fight against corruption, and the protection of the environment and natural resources in all contexts in which it pursues its mission of guiding a sustainable energy transition.

Edison promotes respect for human rights in all its business relations, with its employees, partners, suppliers, contractors and subcontractors. Moreover, it undertakes to ensure that the principles referred to in this document are respected by its own personnel, and to consider them as relevant principles for the purposes of identifying and establishing relations with partners and suppliers.

The Policy applies to all Divisions, Business Units, Departments, Corporate Functions, Offices and Sites and to all Subsidiaries of Edison SpA in Italy and abroad, taking into account the regulatory, social and cultural context of each country.

It constitutes a general policy and reference also for non-subsidiaries through which Edison operates.

## Regulatory framework of reference

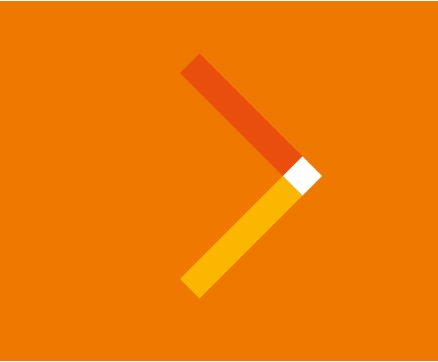
Edison embraces the international commitments of the United Nations and its agencies for the protection and defence of human rights:

- *Universal Declaration of Human Rights (1948)*
- *UN Convention on the Rights of the Child (1959)*
- *Convention on the Elimination of All Forms of Discrimination against Women (1967)*
- *International Covenant on Civil and Political Rights (1966)*
- *United Nations International Covenant on Economic, Social and Cultural Rights (1966)*

<sup>1</sup> UN initiative for the promotion of culture and corporate citizenship

<sup>2</sup> Ten UN Global Compact Principles





Edison also undertakes to apply the principles enshrined in:

- *Fundamental Conventions of the International Labour Organisation (by way of example: Conventions No. 87, 98, 29, 105, 138, 182, 100, 111, 135).*

It also bases its action on the following references:

- *United Nations Guiding Principles on Business and Human Rights*
- *OECD Guidelines for Multinational Enterprises*
- *ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy*
- *UN Global Compact Ten Principles- 2030 Agenda for Sustainable Development*
- *“Manifesto for People and Society” promoted by UN Global Compact Network Italy*
- *Regulation (EU) 2020/852 EU Taxonomy with particular reference to the issue of Minimum Safeguards*
- *Proposed Corporate Sustainability Due Diligence Directive CSDD*

Edison has also made its commitment to the protection of human rights explicit in the following main corporate documents:

- *Code of Ethics*
- *Sustainability Policy*
- *Policy for Health and Safety, Environment, Quality and Sustainable Energy*
- *Diversity and Inclusion Policy*
- *Sustainable Procurement Policy*
- *Whistleblowing Policy*
- *Group-wide Corporate Social Responsibility Agreements*
- *Anticorruption Guidelines*
- *Organisation, Management and Control Models pursuant to Legislative Decree no. 231/01*

The ISO 9001 Quality Certification, ISO 14001 Environmental Management Systems and ISO 45001 Occupational Health and Safety Management Systems, which Edison adopts in full or in relevant areas of its business, constitute good practices and tools for declaring, protecting and monitoring human rights.

## **General principles and best practices in labour rights, community and territorial rights, management of activities**

This Policy identifies the general principles with which all addressees must comply in the exercise of their work in all offices of the Group, irrespective of their location.

Monitoring and respecting human rights at Edison affects essentially two areas: rights associated with labour practices and rights associated with the communities and territories where Edison operates.





## Rights associated with labour practices

### Health and safety at work

Edison is committed to ensuring health and safety in all its workplaces, both for corporate and third-party company personnel, in compliance with the regulations in force and through the adoption of the best International practices and standards for the prevention of occupational accidents.

Edison strives to constantly improve its risk prevention and management systems and to embed health, safety, and quality targets in its business, with a “zero accidents” target. The achievements in health and safety are measured through dedicated indicators. All personnel is informed about those, as well as about educational training, and awareness-raising initiatives in this area, which also extend to Edison’s suppliers and subcontractors.

### Working conditions

Edison is committed to ensuring that the working conditions applied to all personnel fully comply with the legal and collective bargaining framework in force in terms of working hours and days, as well as to ensuring adequate rest and fair compensation. Likewise, Edison demands that third-party companies operating in its building sites, plants, offices, and sites do the same. Furthermore, Edison is committed to providing safe, functional working environments that promote the physical and spiritual wellbeing of the people who are working in them.

### Rejecting child and forced labour

Edison rejects child labour as defined by the legal framework in force in the countries where it operates, ensures compliance with the legal working age at all times<sup>3</sup> and rejects any and all forms of forced labour<sup>4</sup> and any other form of employee exploitation.

### Guarantee of freedom of association and respect for collective bargaining principles

Edison is committed to an ongoing, constructive dialogue with employees, their representatives and other interested parties, based on the principles of transparency and trust, respecting their mutual roles and prerogatives, the relevant European and national laws and regulations, and the practices concerning industrial relations and collective bargaining, the latter being considered privileged tools for confronting and preventing potential social conflicts and for managing any risks relating to the development of corporate strategy.

Edison undertakes to respect the autonomy and independence of trade union organisations and likewise, respects the choices of employees to join the trade union they decide to be represented by.

### Fight against violence and harassment

Edison will not tolerate any form of violence or harassment in the workplace and strives to protect all employees from any and all forms of violation. Specifically, Edison takes all necessary measures in order to prevent and monitor possible harassment cases and any other form of physical and psychological abuse, paying particular attention to gender-based violence, and is committed to raising awareness and educating employees on issues such as harassment risk and the tools to prevent and combat such behaviours.

<sup>3</sup> Currently 15 years (ILO Convention nr. 128) and 16 years according to Italian regulations.

<sup>4</sup> Any work or service extorted from a person under threat of punishment or for which that person did not volunteer (ILO Convention No. 29)





### **Respect for diversity and fight against discrimination**

As outlined in the *Diversity and Inclusion Policy*, Edison considers diversity as an opportunity that deserves attention within the professional sphere, and strives to provide an open, inclusive work environment that is based on meritocracy, enhancement of skills, and the active participation of each individual resource to corporate life and endeavours.

Within its business, Edison strives to ensure fair, equal treatment for all employees and rejects any and all forms of discrimination, be it based on someone's gender, age, ethnic and geographical background, religious, political or union convictions, social or cultural conditions, level of education, disability, family conditions, sexual orientation. The company translates its commitment into action with tools such as awareness-raising initiatives, leveraging partnerships with key agencies, as well as education on inclusion practices and support for the professional growth of all employees, and monitors progress through specific indicators.

### **Development of human capital**

Edison is striving to foster the development of skills, the empowerment of workers and their promotion, the spirit of initiative and the ability to innovate on the ground in order to achieve business results, while respecting the need for work-life balance.

Professional growth and employability are guaranteed through various people strategy tools, designed to ensure equal opportunities for professional development and growth according to meritocratic principles. Access to training courses is one of the opportunities for building professional development consistent with expectations, aptitudes and skills possessed or to be acquired.

### **Rights associated with communities, territories, and management of activities**

#### **Ethics in business management and fight against corruption**

Edison rejects corruption in all its forms and promotes the principles of integrity, loyalty and transparency among its staff and business partners.

Compliance, in all circumstances, with the laws and regulations in force, as well as with the contents of the Code of Ethics - the acknowledgement and acceptance of which is required of all suppliers -, the specific Company Protocols on the subject of Legislative Decree no. 231/2001, the Anti-Corruption Guidelines and the continuous training of all its employees on the subject, constitute the tools for implementing this commitment.

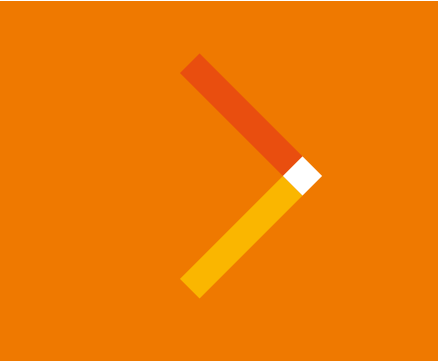
#### **Environmental protection**

Edison is committed to protecting the environment and to ensuring a fair transition to a sustainable and socially responsible transition, by means of an industrial plan that pays special attention to the environmental footprint and the fight against climate change as well as through initiatives and activities aimed at protecting the environment and living species.

Edison works towards the creation of pollution and accident prevention systems and operates in full respect of the environment, the territories, the ecosystems in order to protect biodiversity and natural habitats, in compliance with the regulations currently in force and by implementing internationally acknowledged best practices and standards.

Furthermore, Edison – heir without the benefit of the inventory of Montedison –





is committed to dialogue and cooperation with local authorities in order to find measures to both solve the problem of historical contamination and to give value back to the community through the reclamation of the areas.

### **Respect for territories and communities**

Recognising the territory and communities in which it operates as relevant stakeholders<sup>5</sup>, Edison is committed to a responsible behaviour that translates into creating a climate of respect and trust and, where possible, accommodating emerging expectations through an active dialogue that promotes sustainable development and the creation of shared solutions throughout the life cycle of infrastructures and activities through which the Company's operations are carried out.

Edison is committed to paying special attention to the most vulnerable communities, such as indigenous and tribal communities, should the scope of its energy operator projects extend to these geographical contexts.

### **Data confidentiality and security**

Seeing the protection and processing of personal data and the right to privacy of its stakeholders as a challenge in the age of digitalisation, as well as the confidentiality of information held in its ICT systems as strategic for the sectors in which the company operates, Edison is committed to properly maintaining and continuously improving its information security management systems.

Processes to ensure confidentiality and integrity of information, as well as the security by design approach aimed at maintaining the resilience of all services, are the tools to implement this commitment.

## **Roles and responsibilities**

In consideration of Edison's commitment to respecting Human Rights, the Group Executive Committee has been entrusted with the role of guidance and control body for the policies on the protection of Human Rights promoted and developed by the *Human Resources Division and Sustainability Division*.

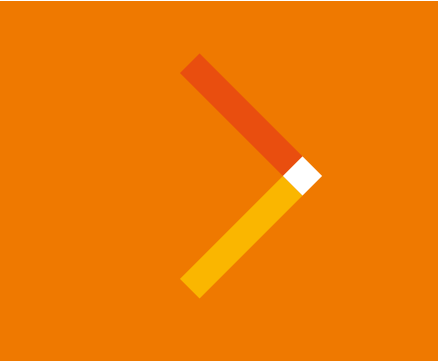
Edison S.p.A. and the other Companies subject to management and coordination will adopt this Policy, promoting its principles, commitments and objectives. Each Company will guarantee its correct and constant application and monitoring, as well as specific training for its staff.

## **Monitoring of risks, monitoring and management of reports and defaults**

In the light of the reference sector and the specific contexts in which the company operates, in order to ensure the protection of and respect for human rights and non-complicity in human rights violation, considering the real and potential impacts of its operations, Edison uses a prevention and mitigation management system that encompasses in an increasingly integrated framework, all types of risk characterising the company's activities and is committed to adopting this approach in a logic of continuous improvement of its processes.

<sup>5</sup> Confirmation by application of dependence, responsibility, influence, proximity and representativeness criteria (Reference: AA1000 SES - Stakeholder Engagement Standard)





With reference to its suppliers, in addition to what is carried out in the qualification, tender, contractual and performance assessment phases, Edison undertakes, on a progressive basis, to monitor their respect for human rights through a specific assessment of ESG risks, based on risk drivers and relevance criteria.

Edison undertakes to devise a monitoring plan to identify risks and manage violations of human rights and fundamental freedoms, people's health and safety, and the environment.

Edison prevents, discourages and handles any violation of the abovementioned principles and supports initiatives aimed at reporting to the Company any conduct acted and/or suffered by stakeholders in violation of this Policy, while respecting the principles of privacy of the whistleblower, through the Whistleblowing Policy.

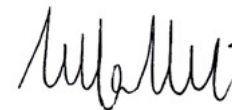
### **Communication, review, and document updates**

Edison undertakes to make this document known to its internal and external stakeholders through corporate channels and to devise a training and awareness-raising scheme.

Information on the implementation and monitoring of this document will be made available for reporting purposes in the Consolidated Non-financial Statement.

This document will be periodically updated by the *Human Resources Division* and *Sustainability Division*, taking into account changes in the regulatory framework, the social context of reference, and corporate strategies.

15 September 2023



**Nicola Monti**  
CEO



**In the case of contradictions or discrepancies between this language version and the original Italian version the Italian language version shall prevail.**