



Policy on interest representation

Contents

Scope and target	2
Regulatory framework of reference	2
General principles and best practices in interest representation	2
Roles and responsibilities	3
Monitoring of risks, monitoring and management of reports and defaults	4
Communication, review, and document updates	5



Scope and target

The definition of guidelines and rules of conduct for the activity of interest representation outlines the framework within which Edison's representatives exercise their functions in a transparent and responsible manner and in compliance with the international conventions, undertaking to act in a fair and honest manner in the process of obtaining information, avoiding undue pressure or inappropriate conduct, in accordance with the values of integrity and responsibility. Edison also undertakes to provide representatives and stakeholders contacted with complete, accurate and updated information. This Policy applies to Edison and all its subsidiaries.

Regulatory framework of reference

Edison acts in compliance with applicable national and supranational regulations concerning interest representation activities. With this in mind, in the EU context, Edison is listed in the European Transparency Register under the number 40111262-07 and the Company's positions, including within the framework of EU consultation procedures, are therefore publicly accessible through the relevant EU portal. As a registered company, Edison complies with the EU Transparency Register Code of Conduct (Annex 3 of the 2014 Interinstitutional Agreement) in its relations with the European institutions. Although at the national level there is no organic and homogeneous legislation regulating the activity of interest representation with the institutions or towards individual stakeholders, Edison is committed to operating in compliance with the laws and regulations in force, guaranteeing correctness and completeness of information and acting in a responsible and transparent manner.

General principles and best practices in interest representation

The interest representation activities carried out by Edison are carried out - in addition to being in line with the ethical principles and rules of conduct contained in the Code of Ethics and Model 231 - in accordance with the principles of the Global Compact of the United Nations in the areas of human rights, labour, environment and anti-corruption.

Moreover, Edison maintains relations with representatives of political forces for the sole purpose of furthering its knowledge of issues of interest to it and promoting its positions in a transparent manner. The company neither finances nor supports political parties or their representatives and maintains neutrality during election campaigns or political events.





Roles and responsibilities

Edison's organisation identifies, within the various Divisions and corporate areas, the corporate functions responsible for and authorised to interact with the Public Administration, public bodies or similar entities. Within this framework, specifically, the Institutional, Regulatory and Climate Change Affairs Division, and more specifically the Institutional Affairs Department is responsible expressly for managing activities to represent corporate interests and relations with institutions (at the various levels of government), public entities, representatives of political forces and relevant associations.

With these institutions and entities, Edison - through all persons authorised as above - pursues its activities, establishes forms of dialogue and cooperation and presents its positions on issues of common interest.

The actions of the appointed functions focus on promoting and defending the Company's interests with institutions and stakeholders of interest in Italy (at a central and regional level), at the European Union and internationally, in order to share corporate and sectoral demands in order to contribute to the definition of policy lines and regulatory proposals with an impact on the evolution of the EU climate and energy framework and - more specifically - on the development of the company's activities.

Corporate employees or collaborators must undertake to act in good faith and with a sense of responsibility and must follow the following conduct:

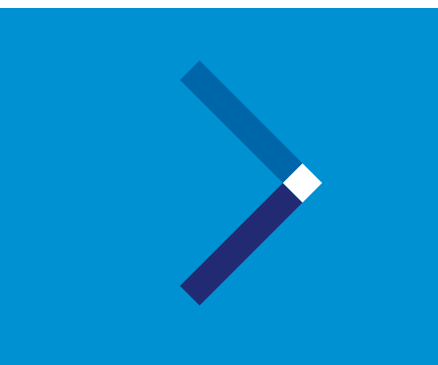
- Identify themselves as Edison employees or representatives before engaging in lobbying or making any public statement
- Always develop arguments based on reliable, verified and up-to-date information;
- Respect the positions of other stakeholders;
- Comply with EU laws, regulations, conventions, etc. governing lobbying, following the codes of conduct of the institutions subject to such activity;
- Communicate and defend positions that are in line with Edison's strategic framework.

They must never:

- Influence or attempt to inappropriately influence the institution's decisions by offering improper advantages, or instigating the violation of the relevant institution's ethical rules;
- Promise or pay/grant sums of money, goods or other benefits for the purpose of promoting or aiding Edison's interests, as well as various forms of aid or contributions;
- Intervening with a Public Official or assisting them in acting in a manner contrary to their official duties;
- Aiming to obtain information or decisions dishonestly, or through the use of undue pressure or inappropriate behaviour;
- Using, for commercial or advertising purposes, information obtained from an EU institution or selling copies to third parties;
- Misleading or deceiving third parties and/or public officials, or asserting any kind of formal relationship with the EU or any of its institutions in their dealings with third parties.

The Edison Group will ensure the correct and constant application of the abovementioned Policy.





Monitoring of risks, monitoring and management of reports and defaults

This Policy has been drafted consistently with Edison's internal regulatory and organisational instruments.

In particular, the activity of interest representation on behalf of the company is pursued in compliance with the provisions contained in the Code of Ethics and the Organisation and Management Model pursuant to Legislative Decree 231/01 ("Model 231"), approved in its latest version by Edison's BoD in July 2023. With this in mind, the Company undertakes to provide clear and easily accessible rules of conduct for the functions concerned for the correct performance of the activities of its relevance and the transparent handling of relations with reference interlocutors.

In order to guarantee and strengthen control over the correct performance of activities involving interest representation, Edison provides a secure system, also in anonymous form, to report any violations of these rules of conduct by its employees or collaborators, in line with the regulatory requirements of Legislative Decree no. 24 of 2023.

In line with the provisions of the Code of Ethics, should any collaborator or employee become aware of situations that actually or potentially may represent a violation of the provisions of the Code of Ethics, they must immediately report them to the Head of the Internal Audit, Privacy & Ethics Department of Edison S.p.A. or to the Head of the D. 231/01 Compliance & Ethics Department. Legislative Decree 231/01 Compliance & Ethics Department. Such reports, once received, are handled in line with the provisions of Legislative Decree no. 24 of 10 March 2023, according to the procedures and in compliance with the principles contained in the Whistleblowing Policy. The Company provides whistleblowers with an online platform dedicated to whistleblowing, published on the Company website and accessible at: <https://segnalazioni.edison.it>.

Edison has established a specific disciplinary system aimed at punishing all conduct that constitutes a violation of the 231 Model.

More specifically, the following constitutes a disciplinary offence:

violation of the rules of conduct contained in the Code of Ethics;
violation of the prescriptions contained in the General Section of Model 231;
the violation of the procedures and protocols formalised in the Special Part of Model 231;
the violation of the reporting obligations towards the Supervisory Board 231;
obstruction of controls, unjustified obstruction of access to information and documentation by the persons in charge of controlling the procedures and the Supervisory Board, or other conduct liable to violate or circumvent the control systems provided for in the 231 Model; the commission of the offences referred to in Article 21(1) of Legislative Decree 24/23¹.

¹ This relates in particular to two types of conduct:

- retaliating against the whistleblower, obstructing (or attempting to obstruct) the report, breaching the obligation of confidentiality;
- failing to set up reporting channels, failing to adopt procedures for making and handling reports (or failing to do so in a manner contrary to the provisions of Legislative Decree 24/23), failing to verify and analyse the reports received.

It is also a disciplinary offence to make reports that constitute offences of defamation or slander, unless the person making the report has been convicted, even if only at first instance, of such offences.



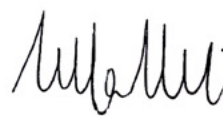


Communication, review, and document updates

The Edison Group pledges to disseminate the Policy particularly through its proprietary communication channels - e.g. the Group's Internet and Intranet websites.

The Policy will be periodically updated by the Institutional Affairs Department, in agreement with the other relevant Divisions, taking into account the evolution of the regulatory framework, the reference context and the evidence that will emerge from the assessments and corporate orientation.

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.