



HERA S.p.A.

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DUE DILIGENCE PROCESS ON HUMAN RIGHTS IN HERA GROUP

Hera has set up an organization and procedures in order to determine actions and behaviors compliant to the law framework and coherent with of the Code of Ethic and Group's values.

Within the Group ERM approach, all risks exposure assessment and risk mapping of potential issues of **Group companies** is carried out systematically every year, including exposure to breaches on Human rights. This year assessment has, once again, highlighted a negligible exposure to these risks in all Group activities. All Group operations concentrated in Italy (and a small activity in gas supply and distribution in Bulgaria) are monitored on compliance on Human rights (also through a centralized management system of Human Resources and CSV departments) evidenced in 2024 to be compliant to the respect of Human Rights principles.

In particular, the following rights were assessed for own operations, supply chain and in due diligence processes related to M&A and joint ventures:

- Child labour
- Forced or compulsory labour
- Human trafficking and modern slavery
- Health and safety
- Freedom of association and the right to collective bargaining
- Discrimination
- Disciplinary practices
- Working hours
- Equal Remuneration

Furthermore, the due diligence process gives special attention to groups that could be more at risk to human rights issues. Based on the assets location and the businesses carried out by the Group, employees, local communities, third-party contracted labor, women, migrant workers, indigenous people and children have been identified as the groups more at risk.

Human Resources and CSV departments are, as a consequence, mainly focused on knowledge development, training programs and in activities aiming at increasing satisfaction and retention of its employees, expanding the Diversity management actions within the Group.

Internal audit department and Human Resources department are engaged every year to verify that actual actions within the Group (own operations and joint ventures) are coherent with the respect of Human rights (child labour, forced labor, Health and safety, Freedom of association, discrimination) and compliant to law provisions in this regard. These verification processes are carried out also to verify the compliance to the standards requested to the different certifications obtained every year (i.e. SA8000). In the last three years no issues nor any gap with Group policies and commitment nor any behavior was not complying to Group expectations and values. Furthermore, the verification has confirmed the correct execution of improvements expected of the issues regarding Human Resources development and on the enhancing of employee's working conditions).

In 2023 Hera carried out a due diligence on all Group employees in order to assess their satisfaction and that Human Rights were respected guaranteeing anonymous questionnaires. That assessment, which is usually carried out every two years, highlighted that no issues regarding behavior nor actions harming Human rights were raised.

The Purchasing department has continued to apply the **supplier** selection methods that include transparent procedures of tendering, evaluating Economic and Social aspects, addressing explicitly Human rights issues as reported on Annual Sustainability report. A risk analysis was carried out to find most critical suppliers (in terms of contractual amount and of practice/activities) in order to extensively pursue a due diligence process for the verification of the respect of Human rights on tier one suppliers. Out of 1,160 pre-audit questionnaires sent in 2024 to supplier (about 2,080 in last 5 years), 39 Audits were carried out on "critical" suppliers in 2024 to assess the full implementation of expected practices and verify data provided in the questionnaires on Human rights (worked out on SA8000 standards). In the last three year 68% of contractors and tier 1 suppliers have been assessed and no issues and risks have been identified. During 2024 training courses were held to employees dealing with suppliers on the issue to provided them the necessary expertise to carry out the audits and the accountability on Human rights compliance of suppliers.

To further strengthen the control, a whistle blowing channel is available to **all stakeholders** as a formal mechanism to respond to enquiries and grievances related to Human Rights. In addition, the Company has other channels of communication with its stakeholders, where they can communicate and express their concerns regarding any infringement, including those on Human Rights. For example, violations of the Code of Ethics can be brought to the attention of the Ethics and sustainability committee in its entirety or to any of its individual members; they can be presented verbally or in writing. For both communication channels it is protected the confidentiality of the identity of the whistleblower. Acts of reprisal or discriminatory acts, direct or indirect, against the whistleblower for reasons directly or indirectly linked to the report are prohibited.

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