

Hera's commitment for the respect of Human rights

The Hera Group, in line with the Purpose, the Mission's objectives, the Code of Ethics and the Quality and Sustainability Policy, carries out its activities in compliance with national and international human rights standards and the principles contained in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The Hera Group adheres to the UN Global Compact sustainability promotion programme of international relevance and is a founding member of the Global Compact Network Italia Foundation. The Hera Group has signed the following declarations of commitment in terms of sustainability:

- Charter for equal opportunities and equality at work (promoted by the Ministry of Labour and Ministry of Equal Opportunities, Fondazione Sodalitas, Impronta Etica, Aidaf, Aidda and Ucid) (2009),
- Value D Manifesto for female employment (2017),
- Women's Empowerment Principles (WEPs) by UN Global Compact and UN Women (2017),
- Utilitalia's pact for inclusion in the company (2019),
- WBCDS Human Rights CEO Guide (2021),
- Manifesto "Business for People and Society" promoted by da UN Global Compact Network Italy (2023).

The commitment of the Hera Group is also expressed in the alignment with SA8000 requirements of relevant Group procedures and policies and maintaining the SA8000 certification for some Group subsidiaries.

Hera Group ask all its suppliers to adhere to the Code of Conduct – Supplier Sustainability Agreement, an integral part of contractual relationships and a necessary condition for working with the Hera Group. The Code, co-designed with a representative group of suppliers, promotes ethical and sustainable growth along the value chain in the three fundamental ESG (Environment, Social, Governance) factors. The Code includes obligations and established requisites relating to human rights and sustainability. In addition to the stipulated requisites, it encourages the adoption of good practices that strengthen the chain's alignment with the Group's ESG objectives, protecting the environment and people.

The main guidelines reported below are consistent with the requirements of the Supplier Code of Conduct.

The Policy for Quality and Sustainability is extended to joint ventures and integrated into the due diligence process in the event of mergers and acquisitions. The Code of Conduct – Supplier Sustainability Agreement applies to all people and companies that, individually or as part of a chain also comprising all subcontractors, supply the goods and services required to carry out Hera's activities and thus contribute to reaching its goals (including all subjects who are part of temporary associations of enterprises and consortia). This covers all qualified suppliers and economic operators who participate in tenders and/or have agreements or concessions with Hera.

Guidelines

Child labour

In relation to the refusal of the use of child labor in the production cycle, Hera hires employees over the age of 18. The use of staff employee under the age of 18 is not excluded if brought back within highly formative projects carried out in full compliance with the laws in force. Hera undertakes to adopt remedial programs in the event of minors at work, in contravention of national law.

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The macro objectives with respect to the topic are:

- To hinder any form of exploitation towards working children, progressively pursuing remedial plans towards suppliers that do not comply with the requirement.
- Support local awareness initiatives against child labor (e.g. initiatives against early school leaving and in support of school education, also through environmental educational activities).
- Do not expose younger workers to harmful or dangerous situations.
- Support the importance of work as a way of personal growth and development within work-based learning programs for high school students.

Forced or compulsory labor

In relation to the refusal of the use of forced labor, Hera does not force employees to work against their will, with the use of threats or punishments.

The macro objectives with respect to the topic are:

- To hinder the adoption of personnel management practices within the supply chain that do not respect the voluntary nature of workers.

Human trafficking and modern slavery

Hera rejects human trafficking and modern slavery. Hera is committed to select, hire and manage employees while respecting their dignity and rights, in compliance with the relevant laws and with its own Code of Ethics.

The macro objectives with respect to the topic are:

- Zero tolerance with slavery and human trafficking in its operations and supply chain.
- Hera safeguards workers against acts of physical and psychological violence and any discriminatory or personally harmful attitude.

Health and safety

In relation to the right to safety and health at work, every employee has the right to operate in a healthy and safe working environment. Hera undertakes to constantly evaluate and manage the health and safety risks that can show up at the workplace, with the aim of minimizing them. For this purpose, it is equipped with a UNI ISO 45001 management system.

The macro objectives with respect to the topic are:

- Develop and consolidate the culture of safety within the company, by spreading issues of prevention and awareness of risks and responsible behaviors.
- Integrate the management of the ISO 45001 requirement into the health and safety management system.
- Define specific objectives, improvement programs and training activities aimed at minimizing accidents and occupational diseases.
- Monitor the psycho-physical well-being of workers.
- Be accountable for health and safety at work when carrying out company activities.
- Promote a healthy lifestyle.

Freedom of association and the right to collective bargaining

In relation to compliance with the right to trade union freedom, Hera respects the right to free association in accordance with the provisions of national collective bargaining. The decision to join an organization is free and does not involve negative consequences for staff, nor repercussions by the company.

The macro objectives with respect to the topic are:

- Respect the right of every employee to form and join unions.
- Building a climate of constructive collaboration in order to minimize conflict.
- Promote the development of industrial relations within Hera.

Discrimination

Any form of discrimination that affects the right of equal opportunity is prohibited. This right is guaranteed and respected in particular during the hiring phase, remuneration, training, promotion, dismissal.

The macro objectives with respect to the topic are:

- Promote the culture of inclusion free from prejudice, equal opportunities and equality at work, avoiding any form of discrimination, whether it refers to physical condition, disability, opinions, nationality, religion, sex, sexual orientation and gender identity, or any other condition that may give rise to discrimination.
- Safeguard employees from sexual harassment, acts of psychological violence and from any discriminatory or harmful attitude to the person.
- Develop personnel management and development models that guarantee inclusiveness and enhancement based on merit.
- Promote working methods that lead to a harmonious and integrated work-life balance, with attention to cases of particular relevance (such as, for example, returning from long absences and care needs).
- Respect the private sphere of its employees and giving attention to their needs in situations of difficulty which might prevent them from carrying out their normal duties.

Disciplinary practices

Hera implements the disciplinary procedures defined in national laws and in the collective bargaining agreement. Staff are entitled to obtain fair, rigorous and never harmful to one's dignity treatment.

The macro objectives with respect to the topic are:

- Ensure compliance with the rules in the application of disciplinary practices, always taking an attitude based on the principle of impartiality and respect for personal dignity.
- Building a work environment based on information and on staff involvement (e.g. clear definition of rules and roles, satisfaction analysis, professional development, evaluation and feedback) in order to minimize the number of disputes.

Working hours

In relation to the right of a working time that respects the reference collective agreements, the recourse to overtime is allowed in compliance with the provisions of the national collective contracts applied and in the supplementary Group agreement.

The macro objectives with respect to the topic are:

- Ensure the respect of working hours and shifts, overtime, etc., in accordance with the provisions of the law and collective bargaining.
- Promote the commitment to constant control of the use of overtime, limiting it as far as possible to the needs related to the continuity and safety of services.
- Promote working methods that combine efficiency and effectiveness in the use of time and space.

Equal remuneration

In relation to the right to a decent remuneration, proportionate to the quantity and quality of their work, without discrimination of any kind and in any case sufficient to insure themselves and their families a dignified existence, the macro objectives are:

- Develop and implement economic treatment policies in line with national collective bargaining, avoiding discriminatory practices.
- Develop and implement economic incentive policies in compliance with the principles of

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adequate role fulfilment, enhancement and recognition of merit.

- Limit the use of non-permanent employment contracts, within the framework provided for by national laws and collective bargaining agreements, to cases of need such as peaks of work, limited activities over time and replacement of staff absent, without prejudice to the cases provided for by law.

Prevention corruption

Hera has adopted a management system for the prevention of corruption, in application of the ISO 37001 standard, certified by a third party. This choice strengthens Hera's commitment to preventing all forms of corruption and bribery, considered obstacles to economic and social development and with a negative impact on the growth of communities.

In accordance with Code of Ethics, board members and employees act with integrity, refuse undue advantages and corruption in all its forms, and avoid situations that may create a conflict of interest between them and the company.

Management system – Due diligence process

For details of the due diligence process, please refer to the document “Due diligence process on human right in Hera Group”.

The due diligence process of the Hera Group:

- performs an impact and risk mapping in the various activities and on the different stakeholders,
- identifies what violation of human rights could occur in the activities managed,
- defines and updates the corporate social responsibility policy and related objectives annually, applying the relevant national and international requirements and standards,
- clearly defines the roles, authorities, and responsibilities of its staff,
- periodically reviews the effectiveness of the management system and makes corrective actions if necessary,
- provides adequate training for staff,
- guarantees the continuous monitoring of the processes also through inspections,
- assesses that the supplier selection model takes into consideration the respect for human rights,
- implements, when non-compliance occurs, all the corrective actions necessary to eliminate them and evaluate their effectiveness.

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