

Non-Discrimination and Anti-Harassment Policy

HERA S.p.A.

Holdig Energia Risorse Ambiente

Viale Carlo Berti Pichat 2/4 40127 Bologna

tel. 051.287.111 fax 051.287.525

www.gruppohera.it

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1. Overview

Hera Group is committed to maintaining a workplace free from discrimination and/or harassment. We prohibit discrimination/harassment in the workplace, whether committed by or against managers, colleagues, customers, suppliers or visitors. We want our employees to work and grow in a healthy, respectful and productive environment.

2. Policy

Hera Group policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, with Hera Group. In the remainder of this document, the term “employees” refers to this collective group.

This policy applies to all behavior related in any way to work, including off-site meetings, training and business trips.

Discrimination or harassment in the workplace based on race, color, religion, sex, national origin, citizenship, age, sexual orientation, disability, marital status or any other basis prohibited by law, will not be tolerated. Hera Group prohibit inappropriate conduct based on any of the above characteristics at work, in the company’s business or at events sponsored by the company.

Any employee or individual covered by this policy who engages in any form of harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).

Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of harassment, provides information, or otherwise assists in any investigation of harassment complaint. Hera Group will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected harassment. Any employee of Hera Group who retaliates against anyone involved in a harassment investigation will be subjected to disciplinary action, up to and including termination. All employees paid or unpaid interns, or non-employees working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or human resources manager.

Harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Hera Group will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about harassment, or otherwise knows of possible harassment occurring. Hera Group will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

All employees are encouraged to report any harassment or behaviors that violate this policy. Hera Group will provide all employees a complaint form for employees to report harassment and file complaints.

3. Harassment definition

Harassment in unwanted, unreasonable and offensive behavior towards the person being harassed, which creates and intimidating, hostile or humiliating work environment for the person concerned.

Harassment is:

- Offending or humiliating someone physically or verbally;
- Threatening or intimidating someone;
- Making unwelcome jokes or comments about someone's race, national or ethnic origin, color, religion, age, sex, sexual orientation, gender identity, marital status, family status.
- There are different types of harassment that can occur at work. Here a not exhaustive list:
 - Race, ethnic origin, nationality or skin color;
 - Gender identity and/or sexual orientation;
 - Religious or political convictions;
 - Membership or no-membership of a trade union;
 - Disabilities, illness, sensory impairments or learning difficulties;
 - Age;
 - Pregnancy/maternity/paternity.

Harassment can occur between people of the same sex or opposite sex.

3.1. Sexual Harassment

Sexual harassment is a form of sex discrimination. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or

objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

4. Responsibilities

All managers have a responsibility to maintain a workplace free of discrimination and personal harassment. Managers are directly responsible for the conduct of their staff and the smooth running of their department.

Also, Hera Group expects all employees to comply with this policy and all employees to conduct themselves appropriately.

Managers are responsible for:

- Promoting a harassment-free workplace and setting an example of appropriate behavior in the workplace;
- Communicating the process for investigating and resolving harassment complaints filed by employees;
- Dealing with harassment situations immediately after becoming aware of them, whether or not a harassment complaint has been made;
- Taking appropriate action during a harassment investigation, including separation of the parties to the harassment complaint if necessary;
- Ensuring that harassment situations are handled in a sensitive and confidential manner.

Employees are responsible for:

- Treating others with respect in the workplace
- Informing their supervisor or the human resources manager of any harassment;
- Collaborating in a harassment investigation and respecting the confidentiality of the investigation process;

Hera Group is responsible for:

- Harassment complaint will be dealt with in a timely, confidential and effective manner;
- Respect employees' rights during the investigation and protect them against retaliation;
- To train employees in order to promote a harassment-free workplace.

5. Procedure, Investigation of Harassment

Creating a Workplace free of discrimination and harassment in everyone's responsibility.

Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a supervisor, manager, human resources manager or to Ethics' Committee. An offensive conduct conflicts also with our Code of Ethics. Reports of harassment may be made verbally or in writing.

All complaints or information about harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner and will be confidential to the extent possible.

The Committee has the duty to carry out investigations and call witnesses, the parties involved including those presumed responsible for the violations, in order to permit the issuing of a reasoned judgement.

An investigation of any complaint, information or knowledge of suspected harassment will be prompt and thorough, commenced immediately and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. Hera Group will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, the Committee will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If complaint is verbal, encourage the individual to complete a 'Complaint Form' in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
- If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses;
- Create a written documentation of the investigation (such as a letter, memo or email), which contains the following:
 - A list of all documents reviewed, along with a detailed summary of relevant documents;
 - A list of names of those interviewed, along with a detailed summary of their statements;
 - A timeline of events;
 - A summary of prior relevant incidents, reported or unreported; and
 - The basis for the decision and final resolution of the complaint, together with any corrective action(s).
- Keep the written documentation and associated documents in a secure and confidential location.

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- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions.

6. Corrective actions

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as Hera Group believes appropriate under the circumstances.

If a party to a complaint does not agree with its resolution, that party may appeal to Hera Group's executive director or the chief operating officer.

False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.