



Policy on preventing, combating and eliminating workplace harassment and violence

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Scope and field of application

In accordance with and supplementing its Code of Ethics, its Human Rights Protection Policy and its Diversity and Inclusion Policy, the Edison Group (“Edison”) hereby reaffirms its commitment to respecting fundamental human rights and to condemning any violence or type of harassment at work, either by its own staff engaged in work activities or by its suppliers, subcontractors or partners.

Edison expresses its commitment to supporting an inclusive, fair, supportive, multicultural, respectful, authentic and plural work environment, free from any form of harassment, violence and sexually inappropriate behaviour, as defined in the glossary set out in Attachment 2 to this document.

This Policy promotes activities to prevent, combat and eliminate any form of abuse, in accordance with Law no. 4 of 15 January 2021 ratifying and implementing ILO Convention no. 190 of 2019 on the elimination of violence and harassment in the world of work, since this is *“a threat to equal opportunities, is unacceptable and incompatible with decent work”*.

Edison undertakes to ensure that the principles set out in this document are respected by all those who, in any capacity and regardless of their contractual relationship (hereinafter Protected Persons), contribute to the achievement of the company’s goals and objectives and participate in the company community.

Protected Persons are people working for Edison, trainees, including interns and apprentices, and candidates entering Edison’s selection process.


This Policy applies to all Divisions, Business Units, Departments, Corporate Functions, Offices and Work Sites and to all Companies controlled by Edison. It is also a general guidance and reference document for any non-controlled companies through which Edison operates.

General principles

The Policy is based on the following essential principles:

- 1.** Edison People are required to collaborate to create a work environment based on respect, to support anyone reporting violent, harassing or harmful conduct or incidents, and to cooperate in the related investigations.
- 2.** Anyone holding a position of responsibility is required to promote a culture that combats workplace violence and harassment, ensuring compliance with the Policy and disseminating its principles in compliance with the prevention measures in place.
- 3.** Any form of violence or harassment that takes the shape of intimidation or blackmail, committed in the exercise of one’s functions or by taking advantage of one’s position of organisational responsibility, is not permitted.
- 4.** A hierarchical relationship need not exist between the victim and the offender in order for harassment and violence to be classified as such. Acts of violence and harassment, in fact, can be committed between same-rank employees as well as by and against third parties.
- 5.** Acts of violence and harassment should be reported in good faith and without fear of retaliation.



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6. It is prohibited to commit any act of retaliation or secondary victimization against whistleblowers or witnesses.
 7. Protected Persons have the right to privacy. Any information reported and arising during any fact-checking process conducted by the relevant company management, will be treated in strict compliance with the principles and regulations in force on Privacy Protection and more generally with all contractual and regulatory provisions on employment.

The Company promotes a culture that is intended to persuade Edison People to adopt an unbiased approach towards any victim of harassment or violence, overcoming individual and collective stereotypes and misperceptions, so as to create a work environment in which people can feel protected and free to confidentially and safely report any harmful incidents.

Preventing and promoting a culture based on respect

Edison is committed to setting up programmes that combat and prevent violence and harassment at work, within which dangers and risks, measures and objectives are assessed, in line with the applicable internal regulations. Prevention, monitoring and cultural promotion measures must be adequate and proportionate to the respective level of control of the company and must include measurable objectives.

People must be informed, made aware of and trained on the contents of the Policy and on the applicable regulations in this area, as well as on their shared responsibility in promoting a work culture based on mutual respect and personal dignity.

To this end, Edison ensures that the contents of the Policy are included in all training and information programmes offered to all Edison People. Participation in such training sessions amounts to due fulfilment of one's contractual work obligations.

Report management procedure

Individuals are encouraged to report incidents of violence or harassment at work which they become aware of by following the reporting channels below.

The Procedure also provides for the establishment within the Company of safe and confidential reporting channels for employees and, in general, for anyone making a report, as well as the adoption of appropriate measures to protect victims of abuse, violence or harassment at work and to prevent further abuse.

4.1 Reporting

Anyone who believes they are the victim of or witness inappropriate behaviour as described in this Policy may initiate a reporting procedure by:

1. contacting the relevant HR Manager, asking for a meeting in person or online; only in the event that the report personally involves the relevant HR Manager, may the report be sent to Edison Group's HR Management; or
2. writing to the internal email address segnalazionimolestie@edison.it





Following the report, the HR Manager who received the report will take appropriate steps to verify the truthfulness of the reported facts; all relevant findings - documents and/or information and/or other relevant evidence - will be treated in compliance with current Privacy Protection regulations and the regulations governing the worker's employment as well as with the law, and will be used to prevent the continuation and/or reiteration of such acts and/or any form of violence or harassment, as well as to support any disciplinary procedure.

Anonymous reports will not be examined as they prevent the ascertainment of the reported facts.

4.2 Management procedure

If the report is sent by email, the procedure will be managed by the HR Manager of the Area concerned by the facts, unless s/he is personally involved in the reported facts, in which case reference will be made to Edison Group's HR Management.

The receiving HR Manager preliminarily evaluates the report and analyses the relevant facts; if the HR Manager believes that there is a serious risk of the harassing conduct continuing or being reiterated, s/he evaluates - liaising with HR Management and the relevant Management of the Company for which the persons concerned work - the appropriate steps to be urgently taken to put an end to and/or prevent the potential reiteration of such harassment.

The HR Manager explains the company procedure to the Reporting Person to make the latter fully aware of it.

During the fact-checking procedure, the HR Manager collects, seeks and assesses all useful evidence to verify the truthfulness of the reported facts to the extent permitted by current regulations on the Protection of the Privacy of the reporting person and of reported persons, current employment regulations and, more generally, the laws in force.

The management process must equally protect both the reporting person and the reported person; to this end, reports should detail all facts, events or circumstances representing the founding elements of the alleged harassment or violence and be made with a degree of accuracy that allows, using the investigative tools available, for the concrete verification of the validity of the reported facts or circumstances, countering any instrumental use of the same.


To this end, the report must contain the following details:

- clear indication of the name and surname of the reporting person;
- a clear and complete description of the facts being reported;
- the time and place of the facts being reported;
- personal details or other elements (such as qualification and service performed) allowing for the identification of the individual(s) who carried out the reported facts;
- the indication of any other individual who can provide information on the reported facts;
- the indication of any documents that can confirm the validity of such facts;
- any other information that may provide useful feedback regarding the actual occurrence of the reported facts.

In particular, the HR Manager:

- 1.** may hear the alleged perpetrator and acquire any relevant information for the purpose of ascertaining and evaluating the truthfulness of the reported facts;



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- 2.** will evaluate and propose to HR Management and the Management concerned, after completing his/her assessment, the most appropriate steps to prevent the reiteration of the harassing conduct, including - if the conditions therefor are met - the application of disciplinary measures provided for by collective labour agreements, in accordance with the relevant contractual and legal procedures.
 - 3.** will keep the reporting person updated on any relevant findings resulting from the investigation and on the completion thereof.

Where deemed necessary, urgent measures may be taken to ensure the safety and psychological well-being of the reporting person and/or of the victim.

The procedure intended to ascertain the truthfulness of the reported facts should be concluded in the shortest possible time, taking into account the complexity of the reported facts and of the investigation methods.

All information relating to the investigation conducted pursuant to this procedure will be kept at the Company's Milan headquarters, in the archives of the HR department, in a location with strictly confidential access.

Should the report be clearly groundless or made in bad faith, with instrumental and/or defamatory intent, the company may evaluate and possibly adopt the most appropriate measures against the reporting person, including - if the conditions therefor are met - any disciplinary measures and/or other actions regulated by current laws. Any misuse of this procedure, such as manifestly opportunistic reports and/or reports made with the sole intent of damaging the reported person or other individuals and any other improper use or intentional exploitation of this procedure, will give rise to liability in disciplinary proceedings and before other competent bodies.

No action or sanction is applied against anyone reporting facts in good faith which, upon subsequent checks, prove to be groundless.

For the purposes of internally monitoring risks, the HR function will periodically provide the Gender Equality Steering Committee with an anonymous list of reports and a qualitative analysis of the events in order to identify any corrective and preventive actions.

At the end of the investigation, one of the following situations may occur:

- a)** The reported act of violence or harassment is deemed groundless based on reasonable evidence. In this case, the reporting person may provide additional information. In any event, the reporting person will be told that false accusations will not be tolerated and may result in disciplinary action.
- b)** The reported act of violence or harassment appears to be well-founded and true. In this case, the HR Manager evaluates the appropriate actions to take, according to the applicable collective bargaining agreement and the law. The HR Manager approves all measures necessary to restore a working environment that is compatible with the personal sphere of the victim.

The persons responsible for the acts that can be classified as violence or harassment are subject to disciplinary sanctions.

Sanctions are imposed taking into account, among other things, the seriousness of the act, the type of conduct, its possible reiteration and the hierarchical relationship between the perpetrator of the act of violence or harassment and the victim.

In the event of acts carried out by parasubordinates or self-employed individuals collaborating with the Company or providing contracted work or services to the Company - as the case may be - the Company will intervene directly on the existing professional relationship or will inform the employers of such third-party workers.

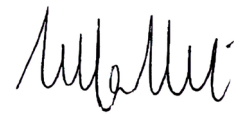


Communicating, reviewing and updating this document

The Edison Group undertakes to ensure that the Policy and its Diversity & Inclusion initiatives are disseminated as much as possible to all the stakeholders concerned, especially through corporate communication channels - for example, corporate Internet and Intranet sites, the Group's social media channels - and through conduct within and outside the company.

The document will be periodically updated by the Human Resources Division, taking into account the evolution of the regulatory framework, the relevant social context and the company's strategies.

15 October 2024



Nicola Monti
Chief Executive Officer
and for the Executive Committee
of the Edison Group



ATTACHMENT 1

Regulatory framework

Main regulatory sources

- Italian Constitution, which acknowledges and protects the fundamental rights of citizens, including the principle of equality (Article 3)
- Law 300/1970 (Workers' Statute), which establishes the fundamental principles of workers' rights and includes provisions on non-discrimination in the workplace
- Law no. 125 /1991 (Positive actions for the achievement of gender equality in the workplace)
- Leg. Decree no. 196/2003 as amended (Protection and processing of personal data)
- Leg. Decree no. 198/2006 as amended (Code of equal opportunities between men and women), which also implements the European directives on gender equality
- Leg. Decree no. 81/2008 as amended (Consolidated law on health and safety at work) which underlines the importance of ensuring an inclusive, safe and discrimination-free working environment
- Law no. 4/2021 on the ratification and implementation of International Labour Organisation Convention no. 190 on the elimination of violence and harassment in the world of work
- Law 162/2021 on gender equality and the related Reference Practice UNI/PdR 125:2022, which defines the minimum standards to be respected to obtain gender equality certification.

Other regulatory references

- CCNL [national collective labour agreements] applied by Edison Group Companies
- WEPS: Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template), UN Global Compact and UN Women, (2010)
- Interconfederal Agreement of 25 January 2016 – "Framework agreement on harassment and violence in the workplace", signed by Confindustria and Trade Unions.
- INAIL Guidelines – "Recognising and preventing harassment and violence in the workplace" (2021)
- The 10 Principles of the UN Global Compact, with particular reference to Principles 1 to 6 which promote respect for Human Rights and Labour Rights
- United Nations Guiding Principles on Business & Human Rights (UNGP), the related Gender Dimensions and the corresponding "Business for People and Society" Manifesto
- OECD Guidelines for Multinational Enterprises
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- United Nations Universal Declaration of Human Rights 1948
- United Nations Conventions on the Elimination of All Forms of Discrimination against Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities
- Declaration on Fundamental Principles and Rights at Work and the ten fundamental Conventions of the International Labour Organisation (ILO)





- Recommendation 92/131/EEC on mobbing and harassment at work
- Resolution A3-0043/94 of the European Parliament on a new post of “confidential counsellor” at the workplace to prevent and counteract gender-based harassment and sexual harassment
- Charter of Fundamental Rights of the European Union (or Charter of Nice) 20/12/2000
- Directive 2000/43/EU to combat discrimination on racial or ethnic grounds
- Directive 2000/78/EU on combating discrimination
- Resolution A5-0283/2001 on the implementation of policies to prevent mobbing in the workplace
- Equal Opportunities Charter
- Directive 2002/73/EU and Directive 2006/54/EU, both concerning equal treatment of men and women in matters of employment and occupation
- European Framework Agreement on work-related stress 08/10/2004
- Treaty of Lisbon 13/12/2007 “Charter of Fundamental Rights”
- Council of Europe Convention of Istanbul of 11/05/2011 on combating and preventing violence against women
- Victims’ Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime
- UN Agenda 2030 for Sustainable Development (2015): SDG 5 on gender equality, SDG 8 on decent work and SDG 10 on reducing inequalities
- International Labour Organisation Convention No. 190/2019 and related Recommendation no. 206/2019 on the elimination of violence and harassment in the world of work

Internal regulations

- Code of Ethics
- Sustainability Policy
- Health and Safety, Environment, Quality and Sustainable Energy Policy
- Diversity and Inclusion Policy
- Human Rights Protection Policy
- Sustainable Procurement Policy
- Whistleblowing Policy
- Trade Union Agreements on Corporate Social Responsibility at Group Level
- Anti-Corruption Guidelines
- Organisation, Management and Control Models pursuant to Legislative Decree no. 231/01
- The ISO 9001 Quality Certifications, the ISO 14001 Environmental Management Systems and the ISO 45001 Workplace Health and Safety Management Systems that Edison adopts in full or in relevant areas of its business amount to good practices and tools for the definition, protection, safeguarding and monitoring of fundamental rights.



ATTACHMENT 2

Glossary and definitions

Personne Tutelate: Protected Persons: Edison people, regardless of their contractual status, trainees, including interns and apprentices, former employees with respect to incidents that occurred while they were working for Edison, and candidates entering Edison's selection process. Protected Persons include Third parties, i.e. subsidiaries or affiliates, partners, customers, suppliers, professionals and other external parties.

Reporting Person: a person who makes a report regarding one or more incidents of violence or harassment at work. The reporting person may be the victim protected by the policy or a person who witnessed the reported facts.

Witness: a person who is informed of facts as a result of witnessing them or of being told by a victim of conduct involving violence or harassment at work.

Definitions

Violence and harassment at work

Pursuant to art. 1 of Convention 190 on the elimination of violence and harassment in the world of work, ratified by Law 15 January 2021 no. 4:

[For the purpose of this Convention:

- a) the term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment;
- b) the term "gender-based violence and harassment" means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.]

Pursuant to art. 3 of the European Framework Agreement on harassment and violence at work of 26/04/2007

[(Description)

Harassment and violence are due to unacceptable behaviour by one or more individuals and can take many different forms, some of which may be more easily identified than others. The work environment can influence people's exposure to harassment and violence.

Harassment occurs when one or more worker or manager are repeatedly and deliberately abused, threatened and/or humiliated in circumstances relating to work.

Violence occurs when one or more worker or manager are assaulted in circumstances relating to work.

Harassment and violence may be carried out by one or more managers or workers, with the purpose or effect of violating a manager's or worker's dignity, affecting his/her health and/or creating a hostile work environment.]



Pursuant to the INAIL Guidelines (2021) – Recognising and preventing harassment and violence in the workplace:

[(Definitions)

Harassment at work: any unwanted conduct carried out also for sex-related reasons, having the purpose or effect of violating the dignity of a worker and of creating an intimidating, hostile, degrading, humiliating or offensive environment (Legislative Decree 198/2006, article 26, paragraph 1).

An aggravating circumstance arises when sexual harassment is accompanied by implicit or explicit threats or blackmail by hierarchical superiors or by persons who may in any way influence the establishment, development and termination of the employment relationship.

Violence at work: these incidents occur where staff are abused, threatened or assaulted in circumstances related to their work, including commuting to and from work, involving an explicit or implicit challenge to their safety, well-being or health (World Health Organization).]

Gender-based violence

According to Article 1 of the United Nations Declaration on the Elimination of Violence against Women (20/12/1993):

[For the purposes of this Declaration, the term “violence against women” means any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.]

According to Article 2 of the United Nations Declaration on the Elimination of Violence against Women (20/12/1993):

[Violence against women shall be understood to encompass, but not be limited to, the following:

b) Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced prostitution; ...]

Gender-based harassment

Pursuant to art. 26 paragraph 1 of the Code of Equal Opportunities (Legislative Decree 11 April 2006 no. 198):

[Discrimination includes harassment, namely any unwanted conduct carried out for sex-related reasons, having the purpose or effect of violating the dignity of a worker and of creating an intimidating, hostile, degrading, humiliating or offensive environment.]

Sexual harassment

Pursuant to art. 26 paragraph 2 of the Code of Equal Opportunities (Legislative Decree 11 April 2006 no. 198):

[Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature and any other type of sex-related discrimination carried out with the purpose or effect of violating the dignity of a worker and of creating an intimidating, hostile, degrading, humiliating or offensive environment.]



Pursuant to Article 1 of the Code of Conduct of 21 January 2022 - Against sexual harassment in the workplace and for the protection of personal dignity, for staff of the prison service department and juvenile and community justice

[(Definition)

Sexual harassment is any form of manifestly unwanted, inappropriate or offensive conduct of a sexual nature, expressed physically, verbally and non-verbally which, in itself or through its insistence, offends the dignity and freedom of a person and/or is likely to create intimidation and discomfort for the latter in the workplace.]

Pursuant to Article 3 of the Code of Conduct of 21 January 2022 - Against sexual harassment in the workplace and for the protection of personal dignity, for staff of the prison service department and juvenile and community justice

[(Cases)

The aforesaid definition of sexual harassment in the workplace includes, but not only, the following acts or conduct:

- a)** *sexual gestures or winking that are perceived as offensive and inappropriate;*
- b)** *inappropriate and offensive sexual attention towards the recipient;*
- c)** *implicit or explicit requests for unwanted sexual services;*
- d)** *disparaging and/or offensive written conduct and verbal expressions directed at a person because they belong to a certain gender or because of their different sexual orientation;*
- e)** *display in the workplace of pornographic material and/or material that is offensive to the personal dignity or image of women, whether by electronic or other means;*
- f)** *unwanted physical contact;*
- g)** *threats or retaliation for refusing sexual attention;*
- h)** *extortion of sexual favours in exchange for benefits, privileges, career advancement or other benefits.]*

