

13 December 2021

Service Order No. 36/2021

RE: Policy on dealing with violence, harassment and bullying in the workplace

Whereas:

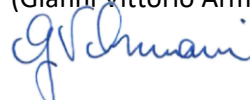
- the law No. 4 of 15 January 2021 has ratified the International Labour Organization (ILO) Convention No. 190 on Violence and Harassment, adopted in Geneva on 21 June 2019, authorising its full and complete implementation in Italian law as of 27 January 2021;
- the ratified Convention (which addresses ILO member states), after clarifying the relevant definitions (violence and harassment in the workplace, gender-based violence and harassment), indicates that *“Each Member which ratifies this Convention shall respect, promote and realize the right of everyone to a world of work free from violence and harassment.”*;
- the Convention also clarifies that: *“Each Member shall adopt, in accordance with national law and circumstances and in consultation with representative employers’ and workers’ organizations, an inclusive, integrated and gender-responsive approach for the prevention and elimination of violence and harassment in the world of work.”*;
- on the same subject matter, an agreement was signed on 25 January 2016 between Confindustria and CGIL, CISL and UIL to raise awareness, among employers, workers and their representatives, of the commitment to disseminate and promote concrete measures to identify, prevent and manage issues arising from harassment and violence in the workplace

the attached **Policy on the management of violence, harassment and bullying in the workplace** is issued, aimed on the one hand at making people and the organisation in general aware of the complex phenomenon of acts of violence and harassment in the workplace and its consequent visible and invisible impacts, and on the other hand at supporting people who are victims of such acts.

The Policy ties in directly with the Diversity and Inclusion Policy and is part of the Group's commitment and initiatives in this area, including any networking activity that it has been carrying out for some time on this issue, particularly with Fondazione Libellula, a non-profit foundation whose purpose is to prevent and combat discrimination based on ethnic origin, religion or belief, disability, age or sexual orientation, on the basis of national, EU and international legislation, and that aims in particular to prevent and combat violence against women and gender discrimination.

The application of the Policy is everyone's responsibility and failure to comply with it will be subject to disciplinary proceedings.

Chief Executive Officer
(Gianni Vittorio Armani)





POLICY ON DEALING WITH VIOLENCE, HARASSMENT AND BULLYING IN THE WORKPLACE **(edition of 13 December 2021)**

1. INTRODUCTION

1.1 Purpose of the document and summary of contents

This Policy, inspired by the Universal Declaration of Human Rights, the International Labour Organization (ILO) Convention No. 190 on Violence and Harassment (adopted in Geneva on 21 June 2019 and ratified by Italy with Law no. 4 of 15 January 2021), by the Values and Code of Ethics of Iren Group (in art. 4.2 and 6.1), outlines the Group's commitment to supporting a safe, respectful and participatory work environment, inspired by principles of fairness, freedom and dignity in professional relationships, free from any form of harassment, sexually inappropriate behaviour and acts of bullying.

The purpose of the Policy is to prevent, identify, constantly monitor and avert acts of violence, harassment and bullying, as well as to provide support to people who report them, protecting them from any retaliatory act.

This Policy reinforces the Group's commitment to ensuring a working environment inspired by respect for equal treatment and dignity for all, regardless of age, ethnic origin, nationality, citizenship, political opinions, religion, marital status, gender, sexual orientation and identity, physical or mental disability and membership of any other category protected by law.

Any act of violence or harassment - which also occur when a person is disadvantaged by virtue of a series of factors outside his or her abilities and is discriminated against on account of his or her general condition, specific disability, genetic characteristics, pregnancy or any relationship entertained with another person - constitutes a threat to the dignity of the person subjected to it, as it could compromise his/her physical and mental health, trust, morale, work motivation and work performance, as well as the organisational climate and reputation of the Group, and must therefore be prevented and opposed.

1.2 Definitions and scope

Definitions

“Violence and harassment” in employment means any physical or verbal conduct that is intended to denigrate or show hostility and aversion to an individual because of his or her (or a family member's) personal affiliation with a gender, sexual orientation, ethnic or national origin, religion, age group, or because of a disability, and which is intended to, may cause, or is likely to cause physical, psychological, sexual, or economic harm, and includes gender-based violence and harassment.

The expression "gender-based violence and harassment" refers to all unwanted conduct related to sex, expressed in physical, verbal or non-verbal form against persons on account of their sex or gender, or which disproportionately affects persons of a specific sex or gender, including sexual harassment as defined in Art. 26 paragraph 2 of the "Equal Opportunities Code", i.e. "unwanted conduct of a sexual nature, i.e. relating to the sexual sphere, expressed physically, verbally or non-verbally, with the purpose or effect of violating the dignity of a worker and of creating an intimidating, hostile, degrading, humiliating or offensive environment".

We need to be aware and pay attention to the fact that behaviours and words can be perceived and interpreted differently by each person.

Scope of application

The Policy applies to all behaviours committed both inside and outside the Companies of the Group, by those who work there, regardless of their contractual status, gender or level of seniority, including trainees and interns (hereinafter "Employees and Collaborators" as also further defined in the Code of Ethics of Iren Group).

This Policy applies to all work occasions both in offices/facilities, in places where breaks or lunch breaks are taken, or in places where sanitary facilities are used or in locker rooms, and off-site (e.g., in clients' and/or suppliers' offices, during events, and in travel locations) and is valid in all work contexts, including travel or business trips, training, meetings, events, and all work-related social situations.

The Policy also applies to communications, including those made possible by information and communication technologies.

2. COMMITMENT AND GENERAL PRINCIPLES

The Group complies with all applicable international and national laws and regulations to prevent and combat violence, harassment and bullying.

The Group considers respect for the rights and inviolability of all Employees and Collaborators to be fundamental and therefore does not tolerate any form of violence, harassment or bullying and undertakes to adopt all appropriate measures to prevent and combat them.

In carrying out their daily work, all the people of Iren Group must contribute to creating and maintaining a respectful and harmonious work environment, eliminating any intimidating, hostile, degrading, humiliating or offensive words and behaviour; they must also contribute to guaranteeing respect for the rights, value and dignity of the individual in all working relationships and to maintaining a work environment in which violence, harassment and bullying are neither accepted nor acceptable.

It is also the duty of everyone to report acts, conduct and communications in conflict with the above.

3. REPORTS

It is essential for the protection of people and the work environment that all Employees and Collaborators report any act of violence, harassment or bullying.

The Group undertakes to support all victims or witnesses and to protect them from any retaliatory acts or negative repercussions in terms of assignment of tasks or other work activities, as well as to adopt the necessary organisational and disciplinary measures against those who commit acts of violence, harassment or bullying.

In the event that violence, harassment or bullying is committed or attempted - without prejudice to the possibility of appealing to the competent authorities - the person who has suffered such acts must report them, using one of the following methods:

- through the channels provided for in the reporting procedure contained in the Group's Code of Ethics (art. 9);
- addressing the report to the "Personnel Management" structure of their own Group Company;
- addressing the report to the Direct Manager or, where the latter is involved, to the Manager of the same or to a trusted person, who in turn will involve the "Personnel Management" structure of his/her own Group Company

In general:

- if there are situations in which an Employee is the victim of behaviour that is forbidden under this Policy, Iren Group requests that this circumstance be reported;
- if the conduct considered contrary to this Policy occurs or if it is believed that someone has violated this Policy, the Group requires that this circumstance be reported, reassuring the Employee or Collaborator that the report will be investigated, and that he/she will be treated with respect and will not be subject to intimidation or retaliation.

As soon as the Group becomes aware of an episode of violence, harassment or bullying, it undertakes, through the competent structures, to investigate and promptly and impartially handle the relative report, adopting all necessary measures to guarantee confidentiality and discretion about said reports and to combat such actions, as well as to report any case of crime to the competent authorities.

Pursuant to this Policy, Employees and Collaborators are required to cooperate in the investigations.

4. SAFEGUARDS

The Group is committed to promoting equal opportunities for all Employees and Collaborators and to communicating, adopting and implementing this Policy throughout the Group.

Training is an essential element in implementing this Policy, including promoting awareness and prevention. In this regard, the Group is committed to providing all Employees and Collaborators with mandatory training courses and updates on combating violence and harassment, aimed at promoting a culture of respect for personal dignity and outlining the relevant procedures to be followed and the potential consequences in the event of prohibited conduct.

Iren also undertakes to provide the necessary assistance and support to all persons who are subjected to behaviour prohibited by this Policy.

If the Group becomes aware of acts of violence and/or harassment, it guarantees that it will work for the immediate cessation of the undesirable behaviour, adopting the necessary organisational and disciplinary measures and reporting any such offence to the competent authorities.

Any Employee who engages in or attempts to engage in conduct prohibited by this Policy, reported and proven, will be subject to disciplinary measures by the Company.

5. PROHIBITION OF RETALIATORY ACTS

The Group is firmly committed to protecting any Employee or Collaborator who reports conduct that is prohibited by this Policy, or raises concerns, from retaliation and - in order to prevent and protect anyone from retaliation - is committed to fostering an environment where everyone feels comfortable communicating openly and honestly and is encouraged to raise in good faith and promptly any concerns about situations that they believe are contrary to this Policy, without fear of retaliation.

Anyone who engages in retaliatory acts against the reporting Employee or Collaborator or the reporting Third Party, including acts aimed at silencing the Employee or Collaborator through economic incentives or other benefits, shall be subject to disciplinary proceedings.

Retaliation is strictly prohibited and is itself a violation of this Policy.

As set out in the Code of Ethics, retaliatory or discriminatory dismissal of the reporting person is null and void. Any change of duties pursuant to Article 2103 of the Italian Civil Code, as well as any other retaliatory or discriminatory measure taken against the whistleblower is also null and void.

6. DISSEMINATION AND UPDATING

The Policy of Iren Group relating to violence and harassment in the workplace is communicated and disseminated within the organisation through the company Intranet, with a view to transparency and collaboration, through specific communications and the grupporenen.it website.

Updates are made periodically and in the event of significant regulatory amendments and/or other changes regarding this matter.

Chief Executive Officer and
General Manager
(Gianni Vittorio Armani)

