

26 November 2025

Group press release no. 37/2025

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

Whereas:

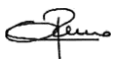
- the law no. 4/2021 has ratified the International Labour Organization (ILO) Convention no. 190/2019 on the Elimination of Violence and Harassment in the Workplace, authorising its full and complete implementation in Italian law;
- the ratified Convention (which addresses ILO member states), after clarifying the relevant definitions (violence and harassment in the workplace, gender-based violence and harassment), indicates that *"Upon ratification, Members are bound to respect, promote and implement the right of everyone to a world of work free from violence and harassment"*;
- the Convention also clarifies that: *"In accordance with national law and circumstances and in consultation with Employers' and Workers' Representative Organisations, Members are required to adopt an inclusive, integrated and gender-centred approach to the prevention and elimination of violence and harassment in the workplace"*;

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 update to the Policy on dealing with violence, harassment and bullying in the workplace is issued, aimed on the one hand at making people and the organization 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.



EXECUTIVE DEPUTY CHAIR

(Moris Ferretti)


POLICY ON DEALING WITH VIOLENCE, HARASSMENT AND BULLYING IN THE WORKPLACE **(2nd edition – year 2025)**

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 the Elimination of Violence and Harassment in the Workplace (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 the Iren Group, outlines the Group's commitment to supporting a safe, respectful and participatory work environment, inspired by principles of fairness, freedom and dignity in personal and professional relationships, free from any form of harassment, bullying or inappropriate behaviour, including that of a sexual nature, and, in general, behaviour that undermines a person's dignity.

The purpose of the Policy is to prevent, identify, constantly monitor and prevent 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, social background, personal beliefs, education and experience, political views, religion, marital status, gender and gender identity, sexual orientation and identity, health status, physical or cognitive ability, and membership of any other category protected by law.

Any act of violence or harassment – particularly if it occurs in a context of discrimination – constitutes a threat to the dignity of the person subjected to it, as it may, on the one hand, undermine that person's physical and mental health, confidence, morale, motivation at work and work performance, and, on the other hand, damage the organisational climate and the Group's reputation; it must therefore be prevented and combated.

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, particularly because of his or her (or a family member's) personal affiliation with a gender, sexual orientation, ethnic or national origin, religion, age group, marital status, social class, 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.

In particular, 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 by all individuals, 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 the 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 Employees of the 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, as well as to adopt the necessary organizational and disciplinary measures against those who commit acts of violence, harassment or bullying.

In the event of an act of violence, harassment or bullying, or an attempt at such an act – without prejudice to the right to report the matter to the relevant authorities – it is essential that the victim reports the incident, not least to prevent any further incidents, using one of the following methods:

- through the application "Iren Integrity Line" (<https://iren.integrityline.com>), a channel set up in accordance with the provisions introduced by Italian Legislative Decree 24/2023 on whistleblowing;
- through the other reporting channels provided for in the Group's Code of Ethics;
- by referring to the "Personnel Management" structure of their own Group Company;

- by referring 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 their own Group Company.

In general:

- if there are situations in which an Employee or a Collaborator is the victim of behaviour that is forbidden under this Policy, the 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, by taking all necessary organisational and disciplinary measures to ensure confidentiality and discretion, to combat this phenomenon and to report any criminal offences to the relevant 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 training courses and updates on combating violence, harassment, and bullying, aimed at promoting a culture of respect for personal dignity and outlining the relevant procedures to be followed and the 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/harassment/bullying, 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, where such conduct is proven, will be subject to disciplinary proceedings by their company.

5. PROHIBITION OF RETALIATORY ACTS

The Group is firmly committed to protecting from retaliation any Employee 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 Iren Group's Policy on Violence and Harassment in the Workplace is communicated and disseminated within the organisation, in a spirit of transparency and collaboration, via the company intranet, through specific communications and on the gruppofiren.it website.

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