

Respect for Human Rights



First issue.

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Board of Directors at the
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1. THE COMMITMENT OF GRIDSPERTISE S.R.L. IN RESPECT OF HUMAN RIGHTS

This Policy expresses the commitments and responsibilities towards all Human Rights, and especially those applicable to the conduct of business and corporate activities, undertaken by the people of Gridspertise S.r.l. and its subsidiaries (hereinafter simply Gridspertise), whether they are directors or employees in any sense of said companies.

Gridspertise promotes both respect for all Human Rights in its business relationships, and adherence to the same Human Rights standards by contractors, suppliers and business partners, paying particular attention to high-risk or conflict-affected contexts.

1.1 International reference framework

This document supports the following treaties of International and European Law and applies their founding principles:

- The United Nations (UN) International Charter of Human Rights;
- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- The fundamental conventions of

the International Labor Organization (ILO) - no. 29, 87 98, 100, 105, 111, 138, 182 - and the Declaration on Fundamental Principles and Rights at Work;

- The UN Convention on the Rights of the Child;
- ILO Conventions No. 107 and No. 169 on the Rights of Indigenous and Tribal Peoples;
- The European Convention on Human Rights.

In addition, the following private sector standards and voluntary initiatives were taken into account in their most up-to-date editions:

- The 10 principles of the UN Global Compact;
- The Guidelines of the Organization for Economic Co-operation and Development (OECD) for Multinational Enterprises;
- The ILO's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" framework.

1.2 Internal reference framework

The following internal documents are linked to the principles listed in this Policy and support its implementation:

- Code of Ethics;
- Zero Tolerance of Corruption Plan;
- Organization and Management Model pursuant to Legislative Decree No. 231 of 8 June 2001 ("Model 231").

2. PRINCIPLES

2.1 Work practices

2.1.1 Refusal of forced or compulsory labor and child labor

Gridspertise rejects the use of any type of forced or compulsory labor^[2] - as defined by ILO Convention No. 29 - nor does it confiscate money or identity documents at the beginning of the employment relationship in order to detain the worker against his/her will.

Gridspertise rejects the use of child labor, as defined by the legislation in force in the country where the activities are carried out, but in any case not less than the minimum age established by ILO Convention No. 138.

2.1.2 Respect for diversity and non-discrimination

Gridspertise rejects any form of discrimination^[3] and is committed to ensuring that its employees and potential employees are treated with respect for diversity and promoting equal opportunities, both at the time of the establishment of the employment relationship and at every stage related to its development.

2.1.3 Freedom of association and collective bargaining

Gridspertise recognizes the right of its employees to form or take part in organizations aimed at defending and promoting their interests. It also recognizes that they are represented within the various production units by trade union bodies or other forms of representation elected in accordance with the laws and practices in force in the various countries in which they are employed. Gridspertise recognizes the value of collective bargaining as a privileged tool for determining the contractual conditions of its employees as well as for regulating relations between company management and trade union organizations.

^[2] By forced or compulsory labor we mean: any work or service exacted from a person under threat of punishment or for which that person has not volunteered. (See Article 2, Paragraph 1, ILO Convention No. 29).

^[3] The term discrimination includes both direct and indirect discrimination, respectively:

a) any distinction, exclusion or preference based on race, color, sex, sexual orientation, religion, political opinion, national descent or social origin which has the effect of denying or impairing equality of opportunity or treatment in matters of employment or profession;

(b) any other distinction, exclusion or preference which has the effect of denying or impairing equality of opportunity or treatment in matters of employment or profession.

(See Article 1 Paragraph 1, ILO Convention No. 111).

2.1.4 Health and safety

Gridspertise is committed to ensuring high standards of health and safety at work.

Gridspertise promotes the dissemination and consolidation of a culture of safety by developing risk awareness and promoting responsible behavior on the part of all employees, including through information and training activities.

Gridspertise works to preserve, especially with preventive actions, the health and safety of workers, as well as the interest of other stakeholders.

2.1.5 Fair and favorable working conditions

In order to maintain a respectful and positive work environment, Gridspertise rejects any type of act of physical, verbal, sexual or psychological harassment, abuse, threats or intimidation in the workplace.

Remuneration takes into consideration the principle of fair compensation for work and equal pay between male and female workers for work of equal value, based on an objective assessment of the work to be performed (ILO Convention No. 100).

The minimum remuneration of Gridspertise employees cannot be lower than that established by the collective agreements and the respective legislative and regulatory treatments in force in the different countries, in line with the provisions of the ILO Conventions.

Gridspertise also recognizes the importance of vocational guidance and training for the development of human resources and their skills, enhancing the forms of involvement and participation of employees and their representatives.

2.2 Communities and society

2.2.1 Respect for community rights

Gridspertise is committed to respecting the rights of local communities and contributing to their implementation, including through the promotion of free and informed consultation activities.

In particular, in the design and implementation of infrastructure projects, Gridspertise undertakes to take into due consideration, within appropriate environmental and social impact assessments, its environmental footprint and respect for Human

Rights in the area where the project is planned. If the implementation of the project could lead to the need to relocate local communities, the goal is to minimize the impact, through their involvement and adequate compensation policies.

With reference to the Voluntary Principles on Security and Human Rights, Gridspertise is committed to ensuring that private security forces operating to protect Gridspertise personnel and property in the areas of activity act in a manner consistent with applicable national laws and international rules and standards, while encouraging public security forces to act in the same manner.

Furthermore, Gridspertise undertakes that its products and services do not compromise the health and physical integrity of its customers, as far as reasonably foreseeable.

2.2.2 Integrity: zero tolerance of corruption

Gridspertise recognizes corruption as one of the factors undermining institutions and democracy, ethical values and justice, the well-being and development of societies and therefore rejects it in all its direct and indirect forms.

For this reason, Gridspertise carries out its commitment through the anti-corruption program called “Zero Tolerance to Corruption Plan”^[4].

2.2.3 Privacy and communication

Gridspertise respects the confidentiality and right to privacy of its stakeholders, committing to the correct use of the data and information provided to it.

Gridspertise is also committed to non-discriminatory institutional and commercial communication that is respectful of different cultures and which at the same time pays particular attention not to negatively affect the most vulnerable public, such as children.

^[4] The Zero Tolerance to Corruption plan is available on the company's website <http://www.grispertise.com>.

3. IMPLEMENTATION AND MONITORING

In accordance with the "Guiding Principles on Business and Human Rights: Implementing the United Nations 'protect, respect and remedy' framework", this document represents Gridspertise's public commitment to Human Rights towards its stakeholders. In order to implement and monitor the commitments expressed in this document, Gridspertise will adopt appropriate due diligence processes^[5] and action plans resulting from the implementation of a Sustainability Plan.

3.1 Stakeholders reports

Gridspertise establishes communication channels for stakeholders to address their reports. Reports can be sent to the contact channels made available on the website (www.gridspertise.com). Gridspertise employees can also send reports to the addresses made available on the company intranet.

In addition, you can send written reports to Gridspertise S.r.l. – Internal Audit – Code of Ethics, Via Ombrone, 2 - 00198 Rome.

In the handling of reports, the whistleblowers will be guaranteed against any type of retaliation

intended as an act that may give rise to even the mere suspicion of being a form of discrimination or penalty against them.

The confidentiality of the reporting party's identity is guaranteed without prejudice to any legal obligations.

If following a report there is a violation of the principles contained in this Policy, the same procedure provided for in the Code of Ethics will be activated.

3.2 Internal audit and review tasks

This Policy will be subject to periodic review by the Internal Audit, in consideration of its adequacy and effectiveness of implementation. Any changes and updates will be submitted for approval to the Board of Directors.

3.3 Corporate social responsibility

Corporate Social Responsibility (CSR) is responsible for (i) planning and coordinating the implementation of

^[5] In the context of the Guiding Principles on Business and Human Rights (Principles 17-21), this term refers to a continuous management system that a company implements taking into consideration the industry in which it operates, the operating contexts, the size of the company and beyond, to ensure that it respects or is not complicit in human rights abuses. This involves "identifying, preventing, mitigating and reporting" adverse effects potentially caused by the company.

the due diligence process, jointly with the other functions involved, to the extent of their respective competences; (ii) reporting to the Internal Audit the information regarding the implementation of the due diligence process; (iii) reporting annually for the Sustainability Report on Gridspertise's performance with respect to the commitments undertaken in this document.

4. COMMUNICATION AND TRAINING

The Human Rights Policy is brought to the attention of internal and external stakeholders through dedicated communication activities. In order to ensure the correct understanding of the Policy by all Gridspertise employees, a training plan is prepared aimed at promoting knowledge of the principles contained therein.

5. DEFINITIONS AND ACRONYMS

Definitions and Acronyms	Description
Forced or compulsory labor	Any work or service extorted from a person under threat of punishment or for which that person has not volunteered. (Article 2, Paragraph 1, ILO Convention No. 29).
Business relationships	The relationships with business partners, value chain companies as well as any other state or non-state entity directly related to the company's activities, products or services. (Principle 13, "Guiding Principles on Business and Human Rights: Implementing the United Nations Protect, Respect and Remedy Framework").
Discrimination	The term includes both direct and indirect, respectively: any distinction, exclusion or preference based on race, color, sex, sexual orientation, religion, political opinion, national descent or social origin, which has the effect of denying or impairing equality of opportunity or treatment in matters of employment or profession; any other distinction, exclusion or preference which has the effect of denying or impairing equality of opportunity or treatment in matters of employment or profession. (Article 1, Paragraph 1, ILO Convention No. 111).
Indigenous and Tribal Peoples	These terms refer respectively to: a) tribal peoples in independent countries who are distinguished from the other components of the national community by their social, cultural and economic conditions, and who live wholly or partially according to their own customs or traditions, or according to special laws or regulations; b) peoples in independent countries who are considered indigenous due to the fact that they are descended from peoples who inhabited the country, or in a geographical region to which the country belongs, at the time of the conquest, colonization or the establishment of the current borders of the State, and which, whatever their legal status, retain all or part of their social, economic, cultural and political institutions. (Article 1, Paragraph 1, ILO Convention No. 169).
Due diligence	In the context of the Guiding Principles on Business and Human Rights (Principles 17-21), this term refers to a continuous management system that a company implements taking into consideration the industry in which it operates, the operating contexts, the size of the company and beyond, to ensure that it respects or is not complicit in human rights abuses. This involves "identifying, preventing, mitigating and reporting" adverse effects potentially caused by the company.
Gridspertise	Gridspertise S.r.l. and its subsidiaries.

