



Respect for human rights

Second issue.

Approved by the Company's Board of Directors at the meeting of
17/12/2025

Scope of application: Gridspertise

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Head of Strategy and Corporate Office
Tommi BLOMBERG

1. DOCUMENT PURPOSE

This document sets out the commitments and responsibilities in relation to all Human Rights, and especially those applicable to the conduct of business and corporate activities, undertaken by the personnel of Gridspertise S.r.l. and of all companies controlled by it (hereinafter simply "Gridspertise"), whether they are directors or employees in any capacity.

2. DOCUMENT VERSION

Version of the Document	Change description
n. 1 of 14/03/2023	First issue. This version cancels and replaces previous policies or documents applicable and/or adopted by Gridspertise regarding respect for human rights.
no. 2 of 17/12/2025	Second issue. This policy has been updated in order to integrate and expand its coverage in terms of the commitment of the company and its employees to respect human rights. This version cancels and replaces previous policies or documents applicable to and/or adopted by Gridspertise with regard to respect for Human Rights.

3. APPROVAL WORKFLOW

Prepared by:

- Legal and Corporate Affairs and Audit

Approved by:

- Head of Governance and Services
- Head of Strategy and Corporate Affairs

4. 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 relationships¹, and adherence to the same Human Rights standards by contractors, suppliers and business partners, paying particular attention to high-risk or conflict-affected contexts.

4.1. 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;

¹ The term business relationships includes "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".

(See Principle 13, "Guiding Principles on Business and Human Rights: Implementing the United Nation's Protect, Respect and Remedy Framework")

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- 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 Nation's "Protect, Respect and Remedy" framework.

4.2. 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").

5. PRINCIPLES

5.1. WORK PRACTICES

5.1.1. REFUSAL OF FORCED OR COMPULSORY LABOR AND CHILD LABOR

We do not accept forced labour, slavery or human trafficking. We do not withhold money or documents in order to retain workers. We protect minors by rejecting child labour in accordance with local laws and ILO conventions.

5.1.2. RESPECT FOR DIVERSITY AND NON-DISCRIMINATION

We promote the principles of diversity, inclusion, equal treatment and equal opportunities, and we are committed to guaranteeing the right to working conditions that respect the dignity of every person, as well as to creating a working environment in which people are treated fairly and valued for their uniqueness.

We are committed to protecting each person's physical and psychological integrity and individuality, and we oppose any behaviour that causes discrimination on the basis of gender, age, disability, nationality, affective and gender identity, ethnic origin, religion, political opinions or any other form of individual diversity, or that harms the person, their beliefs or preferences. Likewise, we promote freedom of expression.

We do not tolerate physical, verbal, visual or psychological harassment of a discriminatory or sexual nature that creates a degrading, hostile, humiliating, intimidating, offensive or unsafe working environment.

5.1.3. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We protect our employees' right to form or join organisations aimed at defending and promoting their interests. Likewise, we respect their right to be represented, within the various production units, by trade unions or other forms of representation elected in accordance with the laws and practices in force in the different countries where they work.

We believe that collective bargaining is the preferred tool for determining our employees' contractual conditions and for regulating relations between company management and trade union organisations.

5.1.4. HEALTH AND SAFETY

At Gridspertise we consider the health, safety and psychological, relational and physical well-being of people to be the most valuable assets to be protected at all times of life – at work, at home and during free time.

For this reason, we are committed to developing and disseminating a strong culture of health, safety and well-being, to ensuring increasingly healthy and safe work processes and spaces, both for our employees and for anyone collaborating with Gridspertise, and to promoting behaviours oriented towards “work-life harmony”. We actively work to foster personal and organisational well-being as enabling factors for engagement and innovative potential both for our employees and for anyone collaborating with Gridspertise.

We promote communication at all levels of the organisation to disseminate strategic principles for our daily actions and to strengthen individual awareness and the adoption of responsible behaviour by everyone.

We promote consultation and participation of workers and their representatives as a key lever for maximising the protection of health and safety.

Our commitment is also reflected in integrating health and safety at all levels of the organisation and in all processes, in training activities, in the careful selection and rigorous management of suppliers and contractors, in the sharing of information and in constant benchmarking with the outside world.

5.1.5. FAIR AND FAVORABLE WORKING CONDITIONS

Anyone working with us, along the entire value chain, is entitled to conditions that respect health, safety, well-being and dignity, the maximum number of working hours, rest periods during the day and week and an annual period of paid leave.

The remuneration of Group employees is based on the principle of fair pay for work performed and on equal remuneration for 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 Group employees may not be lower than that established by collective bargaining agreements and by the legal and regulatory provisions in force in the different countries, in line with ILO Conventions.

We also believe that guidance and vocational training are important for people’s development and skills, particularly in situations affected by the energy transition and in which our approach embraces the principles of circularity, promoting the retraining and enhancement of professional skills through the implementation of specific reskilling and upskilling programmes, in order to foster a just transition.

5.2. COMMUNITIES AND SOCIETY

5.2.1. ENVIRONMENT

Environmental protection and the fight against climate change are fundamental priorities in our activities in order to ensure sustainable development.

5.2.2. RESPECT FOR COMMUNITY RIGHTS

Responsible relationships with local communities are a pillar of our strategy in order to promote social inclusion. We are also committed to ensuring that our products and services are designed to be accessible to all and not to compromise, as far as reasonably foreseeable, the health and physical integrity of our employees and our customers.

We are committed to respecting the rights of local communities. We also cooperate with suppliers, contractors and partners who respect Human Rights and contribute to the socio-economic development of the communities in which we operate.

5.2.3. INTEGRITY: ZERO TOLERANCE OF CORRUPTION

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We adopt an approach based on respect for human rights, aware of the dual impact of corruption phenomena, which, on the one hand, undermine the very role of the State as a sovereign entity responsible for the well-being of its citizens and, on the other, expose the most disadvantaged and marginalised members of society to the consequences of malfunctioning public institutions and increased vulnerability.

For this reason, we combat corruption in all its direct and indirect forms, as we recognise it as one of the factors that undermine institutions and democracy, ethical values and justice, and the well-being and development of societies. We adopt organisational models and systems for preventing and mitigating the risk of corruption that are integrated and supported by the “Zero Tolerance Plan against Corruption²”.

5.2.4. CONDIFENTIALITY AND PRIVACY

We respect the privacy of our stakeholders and process personal data in accordance with applicable laws. We apply privacy by design and by default in all our processes. Our Data Protection Officer ensures compliance with the regulations, and we require the same standards from our partners.

5.2.5. COMUNICATION

We are committed to institutional and commercial communication that is non-discriminatory and respectful of different cultures and that, at the same time, pays particular attention to not negatively influencing the public.

6. IMPLEMENTATION AND MONITORING

In accordance with the "Guiding Principles on Business and Human Rights: Implementing the United Nation's '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 ³and action plans resulting from the implementation of a Sustainability Plan.

6.1. STAKEHOLDER 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.

6.2. 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.

² Zero Tolerance Plan against corruption can be consulted on the company's website: <https://www.gridspertise.com>

³ 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

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6.3. CORPORATE SOCIAL RESPONSIBILITY

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

7. 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.

8. POSITIONING WITH RESPECT TO THE PROCESS MAP

- Core Business Process: -
- Macro Process: Legal and Corporate Affairs
- Process: Compliance

9. REFERENCES

Below are listed the corporate and organizational documents, in the revision in force on the date of issue of this document, to which reference is made.

- Organization and Management Model pursuant to Legislative Decree No. 231/2001 adopted by the Company
- Policy No. 1: "Gridspertise Code of Ethics;
- Policy No. 3: "Zero Tolerance Plan against Corruption (ZTC)"

10. 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 Nation's 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

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Definitions and Acronyms	Description
	treatment in matters of employment or profession. (Article 1, Paragraph 1, ILO Convention No. 111)
Indigenous and Tribal Peoples	<p>These terms refer respectively to:</p> <p>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;</p> <p>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)</p>
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.