

HUMAN RIGHTS POLICY

Italgas carries out its business activities with careful consideration for the acknowledgement and safeguarding of the dignity, freedom and equality of human beings, and the protection of labour and trade union rights, health and safety in the workplace and the environment.

Italgas upholds and promotes respect for all human rights, to be understood, in accordance with the Code of Ethics, as inalienable and essential prerogatives of human beings and the basis for the construction of societies founded on principles of equality, solidarity, the repudiation of war and protection of civil and political rights, social, economic and cultural rights and so-called third-generation rights (right to self-determination, peace, development and the safeguarding of the environment).

With this Policy, Italgas outlines the reference principles and actions taken to safeguard human rights in the conduct of its business and, in general, in any context in which Italgas' people and business partners operate.

The actions carried out by Italgas for the protection of human rights are developed, also in the context of alignment with the first and second principles of Global Compact, within the reference framework of the United Nations' Universal Declaration of Human Rights, the ILO (International Labour Organization) Conventions and the OECD Guidelines for Multinational Enterprises. The Group is also committed to the protection of minor and children rights such those described in the Children Rights and Business Principles.

The following internal documents relate to the principles referred to in this Policy, and support its implementation:

- Code of Ethics, which constitutes an integral part of the organisation, management and control model pursuant to Italian Legislative Decree 231/2001;
- Supplier Code of Ethics;
- Supplier Ethics Agreement;
- Diversity of corporate bodies Policy;
- Italgas Reti's HSEQE Policy.

Work environment

Italgas rejects and condemns any form of violence, abuse, threat, intimidation or other form of physical, verbal, psychological or sexual abuse.

Equal opportunities and non-discrimination

In accordance with the provisions of the Code of Ethics, Italgas opposes any type of unlawful discrimination related to trade union association, skin colour, disability, age, ethnicity, political affiliation, gender identity, language, sexual orientation, race, religion, sex, marital or family status.

Working conditions

In line with the Code of Ethics and the Policy for the prevention of discrimination and the protection of the dignity of Group personnel, Italgas considers entirely unacceptable all and any act or conduct that constitutes harassment or violence in the workplace.

The Group is committed to recruiting, training and promoting the best people for the work at hand, promoting professional development, incentivising all employees to reach their full potential, adopting performance and merit-based compensation systems and supporting the sharing of best practices throughout the organisation.

Italgas guarantees fair and adequate remuneration, in line with the provisions of collective bargaining agreements and industry standards, above living wage, and undertakes to operate in complete compliance with current law governing remuneration, benefits, working hours and overtime, avoiding excessive working hours.

Italgas undertakes to promote virtuous conduct to combat the gender gap and assure equal treatment of all personnel, including those hired from minority groups.

Freedom of association

Italgas recognizes the right of its personnel to be represented by trade union bodies or other chosen forms of representation under current legislation.

Without prejudice to the limitations of compliance with current legislation, Italgas respects the right of its personnel to become members of trade unions and to negotiate on collective basis and, in this sense, it liaises with trade unions at national and local level.

Forced and child labour

Italgas opposes and rejects all forms of abusive exploitation of workers, which includes the use of any type of forced or compulsory labour, as well as any other kind of psychological and physical coercion.

In this context, the use of forms of child labour prohibited under current international and national legislation on the minimum age of admission to employment are banned.

Training

Communication policies are adopted and specific training courses are organised for Italgas' people and business partners, with the aim of ensuring that the required skill levels increase, also with a view to the development and enhancement of human capital.

Business Partners

All Italgas business partners are required to adhere to the values and principles of the company, with a view to identifying reliable partners with which to collaborate on a long-term basis, developing a virtuous cycle aimed at mutual improvement and the achievement of established aims.

During the supplier qualification process in particular, compliance with various requirements is assessed and verified, including the promotion of healthy and safe working conditions and the prohibition of forced labour and economic exploitation of minors.

Also in line with the Strategic Plan, Italgas has started a recurring audit process amongst high risk suppliers in the various phases of the procurement process and contract management, with aim of to guaranteeing compliance with applicable national regulations and best practices.

Aware of the growing importance of the phenomenon of slavery and human trafficking in the world economies, in line with the United Nations Universal Declaration of Human Rights, Italgas adopts a policy of zero tolerance of such violations in its supply chain.

In this area, Italgas demands and regularly checks specific documents confirming the correct management of personnel ("DURC" declaration of regular contributions payments) by its suppliers and/or valid employment of at least one disabled person (diversity) for enterprises with more than 15 employees; in this way Italgas verifies that business partners are consistent and compliant with these requirements.

Italgas undertakes to maintain and improve its procedures to identify and combat slavery and human trafficking in the supply chain.

Health & Safety

Italgas promotes a culture of health and safety as a primary aim for sustainable development, to be achieved with a view to continuous improvement and in compliance with current legislation.

Accident prevention and the safeguarding of health and safety in the workplace are ensured and promoted at all levels of the company and amongst business partners, including via training and awareness-raising activities.

Local communities

The rights of local communities in the territories where Italgas carries out its activities are taken into due consideration in order to contribute to their development in compliance with the provisions of the Code of Ethics.

Protection of Personal Data

Proper management of personal data is a value to be pursued in the context of all business activities.

Italgas is also aware of the importance of ensuring adequate protection to the parties affected by the processing of personal data and protects the right to privacy of Italgas' people and its stakeholders in compliance with current legislation.

Whistleblowing

In accordance with the provisions of the procedure concerning "*Anonymous and non-anonymous reports received by Italgas and its subsidiaries*", reports of alleged irregularities or violations of applicable regulations and internal procedures may be submitted by anyone.

To this end, it is possible to make use of the specific reporting channels provided by Italgas, for example by ordinary mail or e-mail.

The reporting channels are available on the company's website and accessible both to internal staff and to third parties who in any capacity have relations with the Italgas Group.

Communication

This Policy is communicated to stakeholders with a view to transparency and collaboration and is available to the public and anyone who may request it.



Milan, 28 October 2021

The CHIEF EXECUTIVE OFFICER

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