



Equality, Diversity & Inclusion Policy

“Diversity is a fact. Inclusion is a choice.”

Approved by the Board of Directors on 19 October 2022



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1) Introduction: Acea Group's commitment to Equality, Diversity & Inclusion policies

The Acea Group is committed to promoting the inclusion and enhancement of diversity, as well as preventing and combating all forms of discrimination within the corporate community by adopting a policy that addresses initiatives to achieve equal treatment within organisations. These initiatives are innovative inclusion and support measures, respecting and promoting the rights and freedom of the Group's personnel.

The path taken aims to encourage an inclusive culture that values the diversity of all Group personnel, each with their own background, regardless of gender, age, ethnicity, sexual orientation and identity, disability, religion, or other individual trait.

The organisation does not permit any form of marginalisation or penalisation related to the different ways a person's identity is expressed and works on awareness, so as to promote concrete actions to prevent, identify, and fight discrimination in order to maintain a workplace where the dignity of each individual is respected and interpersonal relations are encouraged based on the principles of equality, equal opportunity, mutual fairness, and respect.

Within this framework, this document aims to address values, tools, and actions in the area of Equality, Diversity & Inclusion to support active practices which promote an increasingly collaborative and inclusive workplace.

The above, in keeping with the principles affirmed in the Group's Code of Ethics and respecting and actively publicising the principles established in the current regulations, including by adopting reference procedures and practices.

With the preliminary support of the Ethics and Sustainability Committee, Acea's Board of Directors pursues the values related to Equality, Diversity & Inclusion as strategic drivers for the company's competitiveness and personnel development.

The Acea Group is inspired by standards issued by Italian and international reference bodies and organisations, such as:

- the International Labour Organization's (ILO) *Declaration on Fundamental Principles and Rights at Work*, eight *Fundamental Conventions*, and *Convention no. 190* concerning the elimination of violence and harassment in the workplace (made effective by Italian Law no. 4 of 15 January 2021);
- *Italian Legislative Decree no. 198 of 11 April 2006 – the Code of Equal Opportunities for Men and Women*, and subsequent amendments and additions;
- *The World Business Council for Sustainable Development's CEO Guide to Human Rights*, a call to action for companies wanting to make a positive social impact, as well as a valuable collection of guidelines on how to express the human rights aspects of social responsibility;
- The United Nations *Global Compact*, in collaboration with *UN Women (UNIFEM)*, presented the *Women's Empowerment Principles (WEPIs)* in 2010, covering seven principles inspired by the 2030 Agenda for Sustainable Development and the related Sustainable Development Goals (SDGs):

- Goal 5: *Achieve Gender Equality and Empower All Women and Girls* explicitly calls for action to end all forms of discrimination against all women, girls, and young women everywhere and to ensure women's full and effective participation and equal leadership opportunities at all levels of decision making in political, economic, and public life;
- Goal 8: *Promote Sustained, Inclusive and Sustainable Economic Growth, Full and Productive Employment and Decent Work for All* calls for action to achieve full and productive employment and decent work for women and men, including young people and people with disabilities, and fair pay for work of equal value;
- Goal 10: *Reduce Inequality Within and Among Countries* calls for reducing inequality in income and opportunities within and among countries by promoting the social, economic, and political inclusion of everyone regardless of age, gender, disability, race, ethnicity, origin, religion, economic status, or anything else;
- The *Equal by 30* campaign, a public commitment by public and private sector organisations to work towards equal pay, equal leadership, and equal opportunities for women in the sector by 2030;
- The *2021-2026 Italian National Recovery and Resilience Plan (NRRP)* calls for actions on three axes: Digitalisation and Innovation, Ecological Transition, and Social Inclusion. In particular, Mission 5 of the plan aims to facilitate labour market participation, including through training, strengthen active labour market policies, and foster social inclusion, with special attention to women and young people;
- *UNI ISO 30415:2021 Human Resource Management – Diversity and Inclusion* is a model that enables organisations to initiate a process to continually improve inclusive capabilities and enhance diversity. The standard applies to the life cycle of human resources management, product and service delivery, supply chain relationships, and external stakeholder relationships to ensure fairness, equity, and equality;
- *UNI PDR 125:2022 - Guidelines on Management Systems for Gender Equality, which calls for adopting specific KPIs related to gender equality policies in organisations*, enabling the measurement, reporting, and evaluation of gender-related data in organisations to bridge the gaps that currently exist, as well as incorporate the new gender equality paradigm into the DNA of organisations and produce a sustainable and lasting change over time.

To affirm and formalize its commitment to these issues, the Group has also implemented actions to ensure the proper operation of Acea's corporate bodies by regulating their composition and requiring that their members possess personal and professional qualifications that meet the highest degree of diversity and competence.

In addition, the Group participates in periodic analyses, studies, and research promoted by outside professional companies and has equipped itself over time with procedures, protocols, committees and special bodies as functional tools to demonstrate and strengthen its commitment to promoting inclusion policies by developing transparent policies which ensure a workplace that respects equal opportunities.

2) Internal Boards and Committees

The Ethics and Sustainability Committee, established within Acea's administrative body, provides investigative, propositional and advisory support to the Board of Directors on corporate ethics and environmental, social and governance (ESG) issues. This committee is committed, among other things, to integrating sustainability issues into the corporate strategy and culture, promoting and developing the culture of diversity — according to international best practices — fighting discrimination within the Group, and monitoring the adequacy and implementation of the Code of Ethics.

The internal Diversity & Inclusion Committee, as a technical-consultative Group Body composed of company management, ensures the effective and continuous application of the Policy, including by reviewing, promoting, and monitoring the annual Group E.D&I Plan proposed by the company structures, aimed at spreading a corporate culture based on inclusion and the promotion of diversity by addressing priority actions.

The plan is then presented to the Ethics and Sustainability Committee, which, within the powers assigned to it by the Board of Directors, evaluates the plan and reports to the Board of Directors on its activities every six months.

3) Internal and External References

To promote the reference objectives of this policy, the Group follows external protocols and has internal policy instruments, such as:

- The 2019 Utilitalia Pact *La diversità fa la differenza* (Diversity Makes a Difference) to foster gender, age, culture, and skill diversity, as well as to promote, adopt, and develop diversity management policies, such as work-life balance, transparent merit management, and awareness-raising policies inside and outside the organisation. The Utilitalia Pact invites all associates to subscribe to and adopt a common and shared programme of principles and consequent commitments to be translated into concrete actions;
- The *Code of Ethics*, as a voluntary and unilateral instrument aimed at making the Company's activities transparent and ethically directing its performance, which assumes compliance with current laws, labour contracts, self-regulatory codes the Company subscribes to, and internal regulations and procedures. The Code's purpose is to identify the principles and specific rules of conduct that should inspire the conduct of everyone working in the interest of Acea and its subsidiaries towards all internal and external stakeholders and that underlie the relationships between them;
- The *Whistleblowing Procedure* for receiving, analysing, and processing reports of alleged violations of the Code of Ethics and the rules referred to therein to manage the system of reports and monitoring compliance with the values of transparency, legality, fairness and ethical integrity in relationships with employees, suppliers, customers, and all stakeholders;

- *The Group's Diversity and Inclusion Protocol*: by signing this Protocol (20 July 2021), the Group's subsidiaries, in agreement with the trade unions, are helping to combat all forms of discrimination in the workplace — gender, age, disability, sexual orientation — and value diversity within company organisations;
- Procedures and practices that promote Equality, Diversity & Inclusion by regulating various business processes.

4) Equality, Diversity & Inclusion Goals

As an Italian multi-utility that manages and develops networks and services in the water, energy, and environmental sectors, the Acea Group has a significant impact on citizens and the territory. The inclusive management of processes and services, including through the professional and human contribution expressed by its personnel, enables t greater benefits to be transferred to the communities served, with respect to which the Group recognises itself as the driving force behind change with a social impact along the entire value chain, within the organisation, for customers and for other stakeholders in the area.

The Group considers the involvement of people, their well-being and their development as pillars of a strategy based on sustainability, as it is aware that a corporate culture oriented towards including and valuing all types of diversity produces positive effects inside and outside the corporate organisation.

The values of inclusion and encouraging diversity guide the design, development, and promotion of specific initiatives and policies, allowing the Group's strategy to become a reality and the achievement of important goals combined in actions aimed at spreading an increasingly inclusive culture, which can be seen in the management policies for corporate processes, as well as in individual behaviour at all organisational levels.

In line with the above, the Acea Group is committed to pursuing the following objectives:

- ensure respect for the principle of fairness within the organisation;
- listen to and get to know our people to foster their inclusion regardless of the many facets of diversity;
- combat all types of physical and psychological violence and harassment of any individual;
- implement policies and actions to include and develop people, according to the principles of equity, mutual fairness, and respect;
- support inclusive leadership with a view to equal opportunities and diversity management;
- guarantee open and favourable working environments and tools for every person, avoiding discrimination, according to the principles of safety and accessibility;
- spread the culture of diversity based on dialogue and continuous exchange with a view to innovation and inclusive business;
- measure and communicate progress in this area clearly and transparently.

5) The Principles of Equality, Diversity & Inclusion in Action

The right to diversity must be protected and guaranteed in all organisational and management processes through the understanding, inclusion, and appreciation of differences and the different and unique talents of each individual.

In this regard, the Group's commitment focuses on initiatives and projects undertaken:

- gender equity and overcoming stereotypes that might oppose it by promoting development policies and actions that favour work-life balance, identifying merit-based development and career paths to close the gender pay gap, combating all forms of violence, and breaking down cultural barriers;
- providing equal opportunities for all its people regardless of sensory, cognitive and motor disabilities by adopting any action or measure that attempts to break down cultural, structural, sensory, and physical barriers;
- promoting intergenerational exchange through policies and initiatives that foster discussion and collaboration aimed at the mutual appreciation of each other's talents;
- combating all forms of unconscious bias, with campaigns to raise awareness and spread an inclusive culture.

To give concreteness and concertedness to these actions, the Acea Group has chosen to adopt an Equality, Diversity & Inclusion Plan, updated annually, prepared and monitored by the corporate organisational structures to outline the best relationship between sustainability policies and human capital, with the aim of enhancing its capacity to evolve and adapt to new challenges.

Within the framework of the plan, the strategic role of human capital policies is to apply the principles set out in the employee's working life journey by adopting actions to ensure compliance with the principles of diversity and inclusion at all stages of the employee's journey, in line with the principles of social sustainability, in particular:

- in the recruiting, hiring, and onboarding processes, through rules and policies aimed at eliminating any kind of discrimination and enhancing the Group's brand identity to increase attractiveness to available talent and facilitate the process of overcoming stereotypes linked to certain professional profiles so as to ensure a diverse organisation, respecting the principles of equal opportunities and impartiality;
- in development processes, training and active practices aimed at fostering succession in roles and internal mobility, with policies based on valuing merit and equal and fair access to individual paths built based on real needs and role specifications, consistent with the Group's objectives, with a view to developing managerial and professional styles increasingly consistent with a culture based on respect for diversity;
- in growth and remuneration processes, through actions aimed at preventing any pay gaps, including gender gaps, favouring fair career paths and assigning responsibilities and rewards based on merit, facilitating the exchange of generational and individual experience;

- in the corporate welfare processes, with actions aimed at activating moments of listening to and supporting individuals, as well as spreading a mindset aimed at integrating and supporting all categories bearing additional facets of diversity, with a view to enhancing work-life balance and quality of life through diversified initiatives to meet the specific needs of different targets of the corporate population, also with particular reference to supporting parenthood without distinction of gender;
- in developing internal and external communications initiatives aimed at informing and raising awareness of the Group's personnel and external stakeholders on equality, diversity, and inclusion policies and promoting a culture of inclusion through diversified and interconnected campaigns dedicated to spreading awareness on equality, diversity, and inclusion issues and the value the Group generates externally;
- in promoting corporate best practices aimed at strengthening equity and inclusion to enhance and develop skills through initiatives that ensure equal gender representation among panel speakers at round tables, conferences, or other events, including scientific ones;
- in constantly monitoring the impact and effectiveness of the initiatives promoted through timely monitoring using performance indicators on diversity variables at all stages of people's careers.

6) **Effectiveness and publicising the Equality, Diversity & Inclusion Strategy**

In line with what is described in the strategy and reference principles, this policy, which is periodically reviewed and the subject of training and awareness campaigns for company management, with a view to transparency, is shared with all Acea Group personnel through the intranet site and available to the public through the institutional website so that the Group's values and principles are also shared, known, and promoted to citizens, suppliers, partners, and other internal and external stakeholders.

The objectives and principles contained in the policy are a point of reference for the corporate regulatory system of practices and customs adopted in managing processes in the field.