

HUMAN RIGHTS POLICY





TABLE OF CONTENTS

| | |
|---|-----------|
| 1. THE ACEA GROUP'S COMMITMENT TO HUMAN RIGHTS | 5 |
| 1.1 Introduction | 5 |
| 1.2 Frame of reference | 6 |
| 1.3 Purpose, scope and addressees of the Policy | 9 |
| 2. PRINCIPLES | 11 |
| 2.1 WORK | 11 |
| 2.1.1 Rejection of forced or compulsory labour and child labour | 11 |
| 2.1.2 Freedom of association and collective bargaining | 11 |
| 2.1.3 Working conditions and adequate remuneration | 11 |
| 2.1.4 Health, safety and psycho-physical well-being at work | 12 |
| 2.1.5 Non-discrimination, inclusion, equal treatment and opportunities, valuing diversity | 12 |
| 2.1.6 Welfare and work-life balance | 13 |
| 2.1.7 Skills recognition | 13 |
| 2.1.8 Combating physical and psychological violence, sexual harassment and mobbing in the workplace | 13 |
| 2.2 COMMUNITY, SOCIETY AND ENVIRONMENT | 14 |
| 2.2.1 Access to adequate services | 14 |
| 2.2.2 Customer health and safety | 14 |
| 2.2.3 Responsible marketing and consumer protection | 14 |
| 2.2.4 Respect for local communities | 16 |
| 2.2.5 Protection of privacy | 16 |
| 2.2.6 Security and protection of company assets (physical and cyber) | 16 |
| 2.2.7 Innovation and digital inclusion | 17 |
| 2.2.8 Responsible management of supplier relations | 17 |
| 2.2.9 Fight against corruption | 19 |
| 2.2.10 Fair competition | 19 |
| 2.2.11 Fulfilment of tax obligations | 19 |
| 2.2.12 Protecting the natural environment and ecosystems | 19 |
| 3. GOVERNANCE | 20 |
| 3.1 Implementation | 20 |
| 3.2 Monitoring instruments | 22 |
| 3.3 Whistleblowing procedure | 23 |
| 4. DISSEMINATION AND UPDATING | 23 |



1. THE ACEA GROUP'S COMMITMENT TO HUMAN RIGHTS

1.1 Introduction

The Acea Group carries out its activities with a perspective of sustainable and inclusive growth, taking into account the Sustainable Development Goals (SDGs) of the 2030 Agenda and their declinations at European (Green Deal) and national level, and in full compliance with the ten principles of the United Nations Global Compact relating to human rights, labour standards, environmental protection and anti-corruption, to which it adheres.

For the Acea Group, respect for human rights, understood in their broadest sense and with particular focus on aspects relevant to the areas of operations managed, is an essential value on which the company's governance and actions are based. The Group therefore makes every effort to ensure that no form of violation of these rights occurs, developing and implementing processes that are adequate to identify the risks and impacts, potential or actual, of its activities on the sphere of human rights, prevent violations and, should they occur, remedy them.

Moreover, the Group has long had a Code of Ethics, a fundamental pillar of the internal control and risk management system that defines the values, rules of conduct and principles in which the Group recognises itself, including the protection of human rights in every operating context, including the supply chain, and has activated, both in the Parent Company and in the operating companies, organisational structures or equivalent controls to monitor all areas relevant to human rights (such as, for example, labour rights and human resources management, privacy, fair competition, non-discrimination, gender inclusion and equity, health and safety, access to services, protection of the natural environment, supply chain).

With the will to further strengthen this supervision and promote awareness on the issue, Acea Group has decided to define, in a formal and specific manner, its commitment to the respect of human rights, endowing itself with a dedicated Policy, approved by the Board of Directors of Acea SpA on December 14th 2023, and appropriate tools for its implementation.

1.2 Frame of reference

This Policy constitutes the reference basis for the protection of human rights in Acea Group's activities and is based on documents issued by the competent bodies recognised at international, European and national level (agreements, declarations, conventions, etc.), as well as on the provisions of the corporate regulatory system and internal control (value codes, policies, procedures, regulations, etc.).

International, European and national regulatory framework

The documents listed below are the most relevant on the subject at the time this Policy was drafted.

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- 10 principles of the UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- The Eight Core Conventions of the ILO International Labour Organisation (29, 87, 98, 100, 105, 111, 138, 182) and 190 Convention for the Elimination of Violence and Harassment in the Workplace
- OECD Guidelines for Multinational Enterprises
- Charter of Fundamental Rights of the European Union
- Second National Action Plan on Business and Human Rights 2021-2026.

The Acea Group bases its commitment on the principles and values contained in the above-mentioned documents, also complying with the regulations in Italy and in the countries where it operates; by way of example and not limited to, on the environment, health and safety in the workplace, anti-corruption, privacy and personal data protection, etc.





Internal regulatory framework

The Acea Group has equipped itself with a constantly evolving system of tools which regulate, in a coordinated and normative manner, the various corporate processes, organisational controls and related responsibilities, information flows and control points. These domestic regulatory instruments apply to areas relevant to the sphere of human rights. The main ones are listed below:

- Code of Ethics
- Organisation, Management and Control Model as per the Italian Legislative Decree 231/2001
- Guidelines for the Internal Control and Risk Management System of the Acea Group
- Principles and values of Stakeholder Engagement
- Anti-Corruption Guidelines
- Antitrust and consumer protection regulation compliance manual
- Antitrust Compliance and Consumer Protection Guidelines
- Privacy Governance Guidelines
- Computer Security Guidelines
- Management systems and sustainability policy
- Equality, Diversity & Inclusion Policy
- Anti-Corruption Policy
- “Whistleblowing” Procedure
- Procedure Measuring Supplier Performance
- Procurement Protocol
- Information Security Incident Management Procedure
- Group Stakeholder Engagement Procedure
- Customer Experience Measurement and Monitoring Procedure
- Sponsorship and Donations Procedure

- Tax management procedure
- Diversity and Inclusion Group Protocol
- Charter of the Person and Participation
- UNI ISO 9001:2015 Quality Management Systems
- UNI ISO 37001:2016 Anti-Bribery Management Systems
- UNI ISO 45001:2023 Occupational health and safety management systems
- UNI/PdR 125:2022 Certification for gender equality
- ISO 14001:2015 Environmental Management Systems
- ISO 50001:2018 Energy Management Systems
- EMAS registration
- ISO 10004:2018 Guidelines for monitoring and measuring customer satisfaction

1.3 Purpose, scope and addressees of the Policy

This Policy is inspired by the main international reference standards, referred to above, and presupposes full compliance with the current regulatory provisions and their developments. The Policy, in line with the value principles enshrined in the Code of Ethics and in coherence with the internal regulatory system, expresses, in an organic and integrated manner, the Acea Group's vision of respect for human rights in the conduct of business activities and sets out the reference principles.

This Policy is addressed to the persons who make up the Board of Directors, the Board of Statutory Auditors and the other control bodies of Acea SpA and of the other Companies of the Group, as well as managers, employees, collaborators, suppliers linked to the Group by contractual relations for any reason, even occasional and/or only temporary, within the scope of the activities performed and within the limits of the relevant responsibilities. This Policy is valid both in Italy and for the Companies of the Group present abroad, taking into account the cultural, social, economic and regulatory diversity of the various countries in which Acea operates. The companies controlled by Acea SpA receive the Policy and adopt it with a resolution of their Board of Directors. Investee companies and joint ventures promote the principles and contents of the Policy within their corporate organisations.

CARTA DELLA PERSONA E DELLA PARTECIPAZIONE

*Protocollo tra Acea e le Organizzazioni Sindacali
per rafforzare le relazioni sindacali valorizzando il
coinvolgimento e la partecipazione e per mettere
al centro la Persona.*

15 maggio 2023

2. PRINCIPLES

Without prejudice to the fact that Acea Group's commitment is broadly related to the issue of human rights, in line with the corporate values, this Policy outlines the most relevant reference principles for the Group and its stakeholders, in relation to the type of activities carried out and the characteristics of the territories concerned.

2.1 WORK

2.1.1 Rejection of forced or compulsory labour and child labour

Acea Group rejects all forms of labour exploitation, does not tolerate any form of forced or compulsory labour and any kind of modern slavery, repudiates child labour and guarantees working conditions in compliance with the laws and regulations in force. This focus on the protection of fundamental workers' rights also extends along the supply chain.

2.1.2 Freedom of association and collective bargaining

The Acea Group ensures workers the right to freedom of association as well as the right to set up bodies representing their interests, in the forms and within the limits provided for by law; it guarantees the right to trade unions and recognises the value of collective bargaining as a regulatory source of reference to promote better working conditions. In this sense, the Group has long adopted an evolved model of trade union relations, based on systemic confrontation, involvement and participation of the Trade Union Organisations, in order to combine business objectives with social demands.

2.1.3 Working conditions and adequate remuneration

The Acea Group recognises the right of its staff to perform work services in compliance with the provisions of the law and with what is defined through collective bargaining, both with reference to regulations on working time and non-working time (breaks, rest, holidays).

The Group activates growth and remuneration paths, through actions aimed at preventing any pay gap, including gender gaps, in line with the principle of fair compensation for work and equal pay for men and women for the same work or work of equal value, based on objective assessment. The minimum wage paid may not be lower than that established by national collective labour agreements and applicable regulatory measures, in line with the provisions of the ILO Conventions.

2.1.4 Health, safety and psycho-physical well-being at work

The Group protects people's health by guaranteeing healthy and safe working environments, operating in full compliance with the relevant legislation and putting maximum effort into prevention and awareness-raising activities. To this end, the Group promotes the dissemination of the culture of safety at work, at all levels of the organisation and also among suppliers, by carrying out information and training activities aimed at making people aware of the professional risks related to the activities performed and responsible for the correct behaviour to be adopted. It adopts certified personnel health and safety management systems and is based on a preventive approach, carrying out analysis, monitoring and control activities aimed at continuous improvement. The Group facilitates the direct participation and consultation of workers or through their representatives (Workers' Safety and Environmental Representatives) in matters of occupational safety.

2.1.5 Non-discrimination, inclusion, equal treatment and opportunities, valuing diversity

Acea Group promotes an inclusive culture towards external and internal stakeholders, at all levels of the organisation, fostering interpersonal relations based on the respect for the dignity and uniqueness of each person and on fairness, guaranteeing the right to a fair working environment, in terms of economic treatment and employment opportunities, without discrimination based on gender, age, ethnicity, sexual orientation and identity, disability, religious faith or other individual characteristics. To this end, it guarantees fair and non-discriminatory selection, recruitment and reception processes aimed at attracting new talent and facilitating the process of overcoming stereotypes linked to certain professional profiles, seeking a heterogeneous composition of the company's population, in compliance with the principle of equal opportunities and impartiality.

The Group does not allow any form of marginalisation and pays particular attention to the protection of fragile people, with actions aimed at breaking down cultural, structural, sensory and physical barriers. From the perspective of inclusiveness, eliminating physical barriers in the workplace is the first step towards ensuring equal dignity for all, so that everyone can have equal opportunities for job satisfaction, consistent with individual skills and background. In line with the principles of social sustainability, the Group ensures respect for the principles of diversity and inclusion at all stages of the employee journey, including development, training, growth and remuneration processes. It also has a specific Equality, Diversity & Inclusion Policy, approved by the Board of Directors, which aims to address values, tools and actions to promote an increasingly collaborative and inclusive work environment.

In order to give space to the voices of each person, the Group has set up a direct communication channel dedicated to Diversity & Inclusion to disseminate initiatives and information and collect needs and proposals on these issues.

2.1.6 Welfare and work-life balance

The Acea Group protects the well-being of its people with an evolved welfare system that promotes work-life balance measures and offers employees, and their dependent families, preventive services and services for psycho-physical well-being and parental care, as well as forms of health care and supplementary welfare and economic benefits for employees. The Acea Group has adopted and encourages the adoption of measures to support parenthood that are better than the provisions of the relevant legislation in force.

2.1.7 Skills recognition

The Acea Group recognises the value of skills and the importance of their development for the benefit of the individual and the organisation. To this end, the Group facilitates and supports professional development through the implementation of specific training programmes, the updating of skills through reskilling and upskilling, also through intergenerational exchange.

Moreover, the Acea Group has adopted a Performance Management Model that allows a structured and annual assessment of the skills of all the Group's people, in support of training, development and succession processes in the roles, based on the enhancement of merit, equal access and the clear and transparent sharing of individual objectives and paths built on the real needs and specificities of the role, adopting managerial and professional styles consistent with an innovative and inclusive culture.

2.1.8 Combating physical and psychological violence, sexual harassment and mobbing in the workplace

Acea protects the moral and physical integrity of its people, counteracting acts of physical and psychological violence, including mobbing, and any harassing behaviour, any discriminatory attitude or behaviour or any behaviour detrimental to the person, their beliefs and preferences. Violence in the workplace is a real risk factor for safety and psycho-physical health, which the Acea Group addresses in a structural manner within its prevention system.

2.2 COMMUNITY, SOCIETY AND ENVIRONMENT

2.2.1 *Access to adequate services*

The Acea Group is aware that it provides public utility services, underpinning the fundamental rights of individuals, and that it generates significant impacts on people's living conditions.

The Group therefore plans investments and conducts its activities with the aim of developing services that are accessible and functional to improving people's quality of life and the socio-economic development of the territories, aiming at the highest quality standards of the services/products provided. The Group also monitors the quality perceived by customers to best meet their expectations, and is committed to fair, transparent and non-discriminatory behaviour, with professionalism, courtesy, efficiency and effectiveness. The Acea Group provides customers with adequate and diversified communication and contact channels to facilitate access to information and services, with attention also to the needs of the most fragile groups, developing targeted initiatives (e.g. support and awareness-raising on new digital channels, anti-cheating advice).

2.2.2 *Customer health and safety*

The Acea Group is committed to designing infrastructures and delivering products and services in such a way as to protect the health and physical integrity of customers and consumers, adopting appropriate measures to prevent and protect the health and safety of customers and consumers from any type of potential impact, direct or indirect, with specific regard to the activities managed. For example, the Group pays the utmost attention to controlling the quality of drinking water resources intended for human consumption and those returned to the natural ecosystem at the end of the water cycle, to guaranteeing the safety of electricity distribution infrastructures, and to containing atmospheric emissions from production activities or other environmental impacts.

2.2.3 *Responsible marketing and consumer protection*

The Acea Group is careful to adopt responsible marketing styles, taking care, in the promotion of its products and services, of methods and forms of communication suitable to make the message authentic, clear, transparent and exhaustive, and orienting consumer choices without manipulative or deceptive intent.

The Acea Group adopts initiatives aimed at maintaining a high level of trust and good relations with consumers, through the care of relations with organisations that protect their interests, the monitoring of critical situations, through the activities of the ADR Body for the out-of-court settlement of disputes and the commitment to the prevention of episodes of unfair commercial practices.



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Health & Safety
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2.2.4 Respect for local communities

Acea Group respects the rights of local communities and contributes to their realisation, promoting the socio-economic development of the contexts in which it operates, including through the involvement of a responsible supply chain, towards more resilient, inclusive and innovative models, taking into account the needs of the territory.

The Acea Group involves stakeholders in processes of dialogue and confrontation, in order to acknowledge their requests where compatible and respond to them effectively, anticipating any critical issues. The variety of stakeholder categories involved encourages the sharing of different experiences and points of view, in order to improve the services offered and the quality of life in the territories where the Group is present.

The Acea Group also contributes to the enhancement of the territory by supporting socially useful initiatives with a cultural purpose or that promote the well-being of the community. In this regard, Acea supports, including financially, projects and initiatives promoted by organisations, associations, institutions, etc. that concern social, environmental, cultural, sporting, recreational and charitable issues, aimed at the inclusion of people in particularly disadvantaged social contexts. In choosing proposals to join, Acea guarantees the transparent and documentable allocation of resources and avoids any possible conflict of interest.

2.2.5 Protection of privacy

Acea Group respects the right to confidentiality and privacy of its stakeholders and guarantees the lawful processing of data, in accordance with the provisions of applicable regulations and drawing inspiration from the best practices of the sector. Acea Group is committed to the proper use of the information provided to it and which it processes, respecting the fundamental rights and dignity of the persons concerned, with particular reference to confidentiality and the protection of personal data.

To this end, the Group has adopted a Model of Privacy Governance in line with the provisions of the privacy regulations, which constitutes the organisational and control framework in which both roles and responsibilities (such as the figure of the Data Protection Officer - DPO) and methods for implementing the basic principles of the privacy regulations are identified, with a preventive risk based approach supported by continuous monitoring, periodic reviews and widespread and dedicated training activities.

2.2.6 Security and protection of company assets (physical and cyber)

The Acea Group protects its physical and digital assets by implementing all necessary measures to identify, monitor, prevent and mitigate the risk of incidents or violations of sites and systems, potentially dangerous for people and the territory, and to react promptly in the event of their occurrence. To this end, the Group is committed, through designated organisational structures, to implementing physical and logical security measures aimed at protecting and preserving its sites and

implementing processes and technologies to ensure the confidentiality, integrity and availability of information systems, identifying and assessing risks and minimising vulnerabilities, developing predictive and reactive capabilities, defining business continuity and emergency management plans, and promoting and coordinating training and awareness activities.

2.2.7 Innovation and digital inclusion

The Acea Group considers innovation and digitalisation to be key elements of its business model and explores their frontiers, stimulating their development and experimentation as an evolutionary function of the different businesses managed. In particular, the Acea Group is committed to the dismantling and digitisation of water and energy infrastructures, as well as the treatment and exploitation of waste according to the principles of the circular economy, and the application of new technologies to production and management processes. In this context, the Group promotes collaboration with universities, research centres and start-ups, both national and international, in order to create an open and interconnected ecosystem of participatory innovation and research excellence, thus multiplying the value generated to the benefit of people and territories.

The Acea Group is also committed to the dissemination of digital skills in the contexts in which it operates, in a logic of inclusiveness also aimed at overcoming the digital divide, through awareness-raising, information and training events.

2.2.8 Responsible management of supplier relations

The Acea Group considers suppliers as priority stakeholders, who play a decisive role in the value chain; therefore, it is committed to sharing and promoting the principles contained in this Policy, consistent with the values, rules of conduct and appropriate control measures already provided for and expressed in the Code of Ethics, in the Anti-Corruption Guidelines, in the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 and in other internal regulatory instruments.

Relations with suppliers, including financial and consultancy contracts, are regulated not only by law, but also by appropriate internal procedures that include verification processes aimed at identifying potential reputational and/or corruption risks. In fact, behaviours aimed at protecting the human rights of staff are expected from the supplier and sub-supplier, with particular attention to dignified working conditions (equal treatment and non-discrimination, fight against child labour and forced labour, guarantee of minimum wages, wages in line with the relevant national labour contracts and in any case proportionate to the quantity and quality of the work performed, compliance with the limits linked to the duration of working hours, etc.) and to the protection of health and safety at work, to safeguard the environment (protection of ecosystems and biodiversity, rational use of natural resources, waste minimisation, energy saving, etc.), to guarantee the quality of goods, services and performances and to respect privacy.



2.2.9 Fight against corruption

The Acea Group, on the assumption that an “illicit” profit does not constitute an acceptable profit and that a corrupt act undermines legality and alters the correct social and economic development of the reference context, rejects corruption in all forms and prohibits any conduct that may facilitate or promote corrupt phenomena, committing itself to prevent and oppose unlawful conduct by all persons who, in various capacities, act in the name and on behalf of the Group and for its benefit.

To this end, the Group has defined an anti-corruption framework, aimed at preventing and combating corruptive phenomena, through an organic system of rules, principles and internal regulatory tools, including the Anti-Corruption Guideline, risk assessment and monitoring processes, communication and training, reporting and sanctions.

2.2.10 Fair competition

Acea Group upholds the values of the free market and respects the principle of fair competition, which it applies in the conduct of its business activities, in compliance with current antitrust regulations. The Group has adopted the Antitrust Compliance Programme, a set of internal regulatory and organisational tools, methodologies and processes, including dedicated training aimed at preventing potential risks of infringement of competition and consumer protection laws.

2.2.11 Fulfilment of tax obligations

Aware of the role that taxation plays in financing services to the benefit of the community, Acea Group adopts behaviour inspired by the principles of legality and integrity in complying with tax legislation, ensuring the timely fulfilment of tax obligations and adopting the utmost transparency and loyal cooperation in managing relations with tax authorities. In particular, through the monitoring of tax regulations, formal and substantive compliance with laws, regulations and official interpretations is guaranteed, consistent with the Group’s risk profile and its institutional values, excluding the use of aggressive tax planning schemes. To this end, the Group has adopted a specific procedure that identifies and regulates the roles and responsibilities of the parties involved, as well as the risk control and monitoring activities relating to the tax management process.

2.2.12 Protecting the natural environment and ecosystems

The Acea Group is attentive to the protection of the natural environment and ecosystems, working to preserve their integrity, respecting the community and the intergenerational pact. To this end, it has implemented Environmental and Energy Management Systems and defines environmental objectives, improvement programmes and tools to control and monitor potential and actual risks and impacts, to prevent and minimise them.

The Group is committed to the sustainable management of natural resources, and water in particular, valuing their correct use and paying attention to waste reduction, rational use and reuse; to protecting the territories in which it operates, safeguarding ecosystems, protecting biodiversity and combating deforestation; to containing the phenomenon of climate change and its effects with mitigation and adaptation actions, such as infrastructure resilience, efficient use of energy, increasing production from renewable sources and developing a circular economy logic.

The Group also promotes environmental awareness and training activities for internal and external stakeholders, pursuing the growth and dissemination of ecological awareness.

3. GOVERNANCE

3.1 Implementation

All addressees of the Human Rights Policy, referred to in Section 1.3, are obliged, within the scope of their respective duties and responsibilities, to pursue and respect its principles.

The implementation of the principles referred to in this Policy is ensured by the operation of the relevant organisational structures, by compliance with current legislation and by the application of internal regulatory tools, such as the Code of Ethics, policies, procedures, guidelines, certified management systems, etc., depending on the relevant areas.

In order to strengthen the awareness of the correlation between these areas and the sphere of human rights, as well as to guarantee adequate monitoring of the risks and potential impacts generated, even indirectly and unintentionally, the Group undertakes to equip itself with further dedicated tools, referred to in point 3.2, and to undertake training initiatives, aimed at ensuring the dissemination of knowledge of this Policy and the development of a culture of respect for human rights, in their broadest sense.

The Ethics, Sustainability and Inclusion Committee, in relation to the tasks assigned by the Board of Directors, monitors the adequacy of the Human Rights Policy and its effective implementation, with the support of the Ethic Officer, as the person responsible for handling whistleblowing reports.





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3.2 Monitoring instruments

The Acea Group is committed to monitoring the effectiveness of the approach adopted with a due diligence process, which, through the implementation of dedicated tools, provides for the integration of human rights issues in the risk assessment and management model, strengthening the internal control system with specific attention to the issue.

These instruments consist of:

- in the performance of second-level controls on the activities carried out by the operational headmasters, in their respective fields of activity relevant to the various Principles defined in the Policy;
- the activation of a periodic process of identification and assessment of potential risks/impacts related to the sphere of human rights, consistent with the Principles defined in the Policy, and the preparation of a specific risk register;
- in defining mitigation measures for identified risks and assessing their appropriateness, including by promoting, where applicable, opportunities for discussion with stakeholders affected by potential impacts;
- in the explicit introduction and highlighting of the human rights issue within the already operational breach reporting channel (whistleblowing) (see point 3.3);
- in the provision of remedial measures in cases of proven human rights violations.

3.3 Whistleblowing procedure

If stakeholders, whether internal or external, believe that a violation of human rights has occurred, they can report it via the “Report Whistleblowing” electronic platform dedicated to the reception, management, analysis and processing of reports. The procedure must ensure the highest degree of confidentiality and secrecy in handling reports, as well as protecting whistleblowers against possible retaliation by keeping their identity confidential, unless specifically required by law. The platform ensures the confidentiality of the reporter’s identity, the secure archiving of transmitted and uploaded documents and the confidential management of analysis and management processes, guarantees the protections provided for by Legislative Decree No. 24/2023 and is therefore considered preferable to any other channel that might be used.

4. DISSEMINATION AND UPDATING

The Group undertakes to disclose this Policy to all stakeholders, internal and external, including collaborators, suppliers and partners, making it available on the corporate website and/or through dedicated communication/training activities, so that there is full awareness and further impetus to the promotion of human rights as an integral part of the value system of Acea Group.

The Human Rights Policy will be periodically reviewed for adequacy in light of evidence from assessments and monitoring of national and international trends in the protection and promotion of fundamental rights.

Any future updates and revisions will be subject to approval by the Board of Directors of Acea SpA.

