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Conform Politicii de Clasificare și Tratare a Informației nr. 59

HUMAN RIGHTS POLICY

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Pagina 1 din 13

Rețele Electrice România S.A.

B-dul. Mircea Vodă 30, et. 3, Sector 3, București

Nr. de ordine în Registrul Comerțului J2002001859405, Cod Unic de înregistrare 14507322,

Capital social subscris și vărsat 580.355.660 lei

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1. INTRODUCTION

RETELE ELECTRICE ROMANIA S.A. (hereinafter referred to as the " Company") is part of a dynamic and forward-thinking group of companies, that creates career opportunities and fosters prosperity while setting high standards in business practices. Consequently, its top priority is to respect human rights, its employees, and all stakeholders involved in its activities.

This includes:

Education and Awareness: The Company conducts regular training sessions to educate and raise awareness among employees about human rights principles. This initiative ensures that all employees are fully informed of their rights and obligations.

Monitoring and reporting: The Company establishes mechanisms to monitor compliance with human rights standards. This involves regular reporting to the parent company, PPC S.A., to ensure transparency.

Stakeholder engagement: The Company collaborates with local communities, suppliers, and other stakeholders to promote and respect human rights. This includes conducting due diligence to identify and mitigate any human rights impacts and risks related to its operations, suppliers, and other stakeholders.

2. PURPOSE OF THE POLICY

This Policy establishes a framework for promoting respect for and protection of Human

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Rights, both within the Company's control environment and in its sphere of influence.

3. SOURCES OF PROTECTION OF HUMAN RIGHTS

The development of this Policy has considered various internationally recognized standards, regulations, principles, and guidelines.

1. The International Bill of Human Rights;
2. The United Nations Guiding Principles on Business and Human Rights;
3. The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises;
4. The Declaration on Fundamental Principles and Rights at Work and the Fundamental Conventions of the International Labour Organisation (ILO);
5. The UN Sustainable Development Goals (SDGs) and the 2030 Agenda for Sustainable Development;
6. The UN International Human Rights Conventions;
7. The European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR);
8. The European Social Charter;
9. UN Global Compact;
10. Romanian Constitution;
11. Romanian Labour Code;

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12. Law No. 30/1994 on the ratification of the Convention for the Protection of Human Rights and Fundamental Freedoms and the additional protocols to this convention.

4. SCOPE OF APPLICATION

The principles and provisions contained in this Policy shall apply to the members of the Board of Directors, persons who are part of the Company's administrative, management or supervisory bodies, as well as managers, employees and collaborators connected to the Company by contractual relationships of any type, also occasional and/or solely temporary.

Additionally this Policy shall also apply to affected stakeholders (in accordance with Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023). The Company ensures that it collaborates with suppliers and other third parties that implement similar policies in their business operations.

5. RESPECT FOR HUMAN RIGHTS

The Company is committed to proactively protecting, respecting, and upholding human rights within its scope of operation.

At the same time, it establishes remediation and corrective mechanisms in the event of any breach of the Principles set forth in this Policy.

i. Health and safety at work

Health and safety in the workplace are of utmost importance and are intrinsically linked to the protection of human dignity and its inviolability. The Company endorses and promotes a corporate culture that prioritizes health and safety at work above all else.

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The organization follows current health and safety regulations to maintain hygienic and safe conditions in the workplace, aiming to minimize the risk of accidents or injuries. It also conducts regular training sessions and awareness programs to identify unsafe working conditions promptly.

Employees are regularly informed about health and safety issues at work and are provided with the appropriate Personal Protective Equipment for the tasks they perform.

ii. **Appropriate working conditions**

The Company compensates its employees in accordance with relevant legislation, regulations, and operational collective bargaining agreements. The determination of salaries is based on objective criteria. Overtime work is compensated according to legal regulations.

Furthermore, the Company ensures timely and regular payment of salaries to employees, who also have access to their monthly payroll statements.

In addition, all employees are entitled to the annual leaves as stipulated by labour legislation, regardless of their employment relationship.

iii. **Freedom of association and collective bargaining**

The Company complies with legal requirements concerning the right to associate and collective bargaining, ensuring that employees involved in legally recognized labour unions are not subjected to intimidation or harassment.

Furthermore, the Company upholds open communication and engages in constructive dialogue with legally elected employee representatives, maintaining mutual respect and good faith.

iv. Zero tolerance for discrimination/violence and harassment at work

The Company respects diversity and equal opportunities, not tolerating any form of discrimination. It provides equal opportunities in recruitment, development, education, training, remuneration, and performance appraisal. Discrimination based on race, sex, color, nationality, religion, age, disability, marital status, sexual orientation, gender identity, political beliefs, or any other legally protected status is not tolerated.

The Company does not tolerate any form of physical, verbal, sexual or psychological harassment or violence, as well as threats and intimidation at work. The Company is dedicated to protecting the rights and dignity of vulnerable groups, including women, migrants, and people with disabilities, as per EU Regulation 2023/2772, including by such measures as the implementation of policies and procedures.

v. Child labour

The Company complies with laws regarding minimum age limits in recruitment and contributes to the eradication of child labor.

vi. Slavery, forced labour and human trafficking

The Company prohibits any form of forced labor or human trafficking and maintains zero tolerance for conditions that may promote modern slavery.

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vii. Protection of Personal Data

The Company implements measures to maintain the confidentiality, security, and protection of personal data belonging to its employees and customers. These measures help prevent alteration, damage, loss, destruction, or unauthorized access by third parties.

Moreover, the Company facilitates the exercise of individuals' rights concerning the processing of their personal data, in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR).

viii. Ethical marketing practices

The Company avoids unfair or misleading advertising and marketing strategies, aiming to communicate responsibly with consumers and end users.

ix. Combatting Corruption

The Company is committed to combating corruption in all its forms, strictly forbidding bribery and extortion, and proactively implementing procedures to prevent corruption.

x. Environmental protection

The Company adopts a proactive approach to environmental challenges, by continuously undertaking initiatives to reduce its environmental footprint and by encouraging the development and dissemination of environmentally friendly technologies aiming at achieving the energy-green transition.

xi. Rights of the affected local communities

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The Company recognizes the importance of its relationship with the local communities where it operates.

Therefore, it engages in respectful communication and collaboration with these local communities to determine actions, investments, and decisions that could affect their rights, well-being, economic development, and social progress.

xii. Disciplinary practices

The Company's disciplinary practices are implemented for its personnel as necessary to manage and prevent unacceptable behavior, in compliance with labour legislation and the internal regulations of the Company.

The Company ensures that these practices are consistently and fairly applied to all employees, without regard to personal characteristics such as gender, national origin, or religion.

The Company encourages employees and stakeholders to report any misconduct, so proper measures can be taken to prevent future incidents. The Company does not permit harassment or any actions, attitudes, or behavior that are humiliating, intimidating, or hostile. Additionally, the Company protects human rights defenders by ensuring they can operate without fear of retaliation or intimidation. Retaliation or intimidation against individuals who report issues in good faith is strictly prohibited.

xiii. Corporate Social Responsibility

The Company consistently operates with responsibility and full transparency throughout

its business activities. The Company's operations and business practices demonstrate a commitment to environmental stewardship, the implementation of best labour practices, and conscientious engagements with all stakeholders. The Company's approach aligns with its Sustainability Policy, incorporating Environmental (E), Social (S), and Governance (G) criteria into its operations and business decisions.

Recognising the significant role of social capital in fostering trust and cooperation, the Company invests in and provides incentives for its development and maximisation.

Additionally, the Company's actions are fully aligned with the contemporary philosophy of corporate responsibility, driven by Creating Shared Value (CSV). The Company is continually adapting its business practices to create long-term value shared with all stakeholders, thereby establishing conditions for sustainability for future generations.

6. ACTIONS AND PROCEDURES FOR THE IMPLEMENTATION OF THIS POLICY

The Company is dedicated to upholding human rights across all facets of its operations. The implementation and oversight of the principles outlined in this document are grounded in appropriate due diligence procedures.

The Company incorporates respect for human rights, including labor rights and customer/consumer rights, into its corporate governance and decision-making processes. This approach ensures that human rights are embedded within the Company's operations and strategies, with clear accountability at all organizational levels.

The Company through the Sustainability and Environment department conducts impact

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assessments of its business activities and value chain to identify and evaluate actual and potential human rights implications. In the process of identifying, assessing, and addressing the human rights impacts of its operations and partnerships, the Company engages with those potentially affected.

In accordance with its commitment, the Company has created various channels through which employees and stakeholders can submit complaints. These include complaint forms, email and a dedicated web portal for voice and written reporting . Additionally, it has established a formal complaint management system as outlined in the Whistleblowing Policy, ensuring that complaints are handled systematically. Reporting on suspected violations of the human rights are investigated and examined in accordance with the provisions of the Company's Whistleblowing Policy.

By this Policy, the Company proactively takes steps to prevent, mitigate, and address human rights impacts by utilizing grievance mechanisms to investigate incidents, develop action plans, and provide appropriate remediation when adverse events are identified.

In instances of adverse human rights events, the Company enacts fair and effective measures to uphold its commitment to respecting and promoting human rights in all activities.

Lastly, the Company communicates its efforts and performance externally through the Sustainability Statement, aiming for transparency and accountability to all stakeholders.

7. TRAINING AND AWARENESS

The Company promotes awareness and respect for human rights among employees and

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third parties, such as suppliers. Initiatives for training and raising awareness about human rights are conducted throughout the organization. Human rights training and awareness initiatives include specialized e-learning modules and workshops across the organisation. The principles of human rights are included in the induction training of new recruits, and suppliers are informed of the key procedures and policies adopted by the Company, including the Code of Conduct, the general principles of which must be respected by all parties

These efforts aim to integrate human rights into daily operations and ensure the Company's adherence to its values across its value chain. The Company implements these practices in accordance with the applicable regulatory framework.

8. VIOLATIONS OF THE POLICY

Violations of this Policy will not be tolerated and may result in sanctions as specified by the relevant regulatory and legislative framework.

Individuals who become aware of a violation should report it through the established channels and follow internal procedures.

According to the Whistleblowing Policy the available Internal Reporting channels are the following:

1. The „Whistleblower” Portal - a dedicated web portal for submitting internal reports, which provides both voice and written reporting and can be accessed here <https://ppcromania.whistlelink.com/>

2. Email to the College of Ethics at colegiuldeetica@ppcgroup.com

9. RESPONSIBILITIES

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Individuals to whom the policy applies/is addressed to, have a duty to abide by the principles and rules set out.

10. MONITORING, REVIEW AND EVALUATION OF THE IMPLEMENTATION OF THE POLICY

The Division for People & Organisation, in cooperation with the Division of Legal and Corporate Affairs, is responsible for updating this Policy, ensuring that it is always based on best practices.

Specifically, the Policy will be reviewed at least every two (2) years or periodically, when deemed necessary. Any updates, additions and/or amendments to the Policy will be approved by both the Chief Legal and Corporate Affairs Officer and the Chief People and Organisation Officer.

This Policy shall enter into force upon its approval by the Board of Directors on 17.12.2025.

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