



San Donato M.se 11-6-2021

Snam, a European leader in the construction and integrated management of energy infrastructure, is aware (i) of its role of primary importance in the industrial sector and market it operates in and (ii) of its responsibility for safeguarding the dignity, freedom and well-being of the people who work and/or collaborate with the Company, as well as the communities where it operates.

To achieve and promote the well-being of individuals and safeguard Human Rights, both as individuals and as part of social groups, Snam pursues and disseminates a policy when conducting its business that is aimed at the practical implementation of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the ILO - International Labour Organization, the OECD Guidelines for Multinational Enterprises and the principles established in the United Nations Global Compact, of which it is a member.

In this policy, Snam outlines the founding principles and actions taken to safeguard Human Rights in the conduct of its activities and, in general, in any context in which it operates, including through its business partners. This policy applies to Snam and its Subsidiaries and is brought to the attention of the other investees in order to promote behaviours and principles in line with those expressed herein. Snam also commits to disseminating the values in this policy among all Snam people, its suppliers, subcontractors and business partners, as well as anyone else, wherever they may be, acting in any capacity in the name and/or on behalf of Snam.

For Snam, full agreement with the content of this policy is fundamental for setting up and developing reliable, lasting collaboration relationships, and is aimed at mutual improvement with a view to a shared commitment to strengthen protection in this area.

Snam, in line with the provisions of the Code of Ethics, recognises people as an essential part of the Company's development and promotes their skills, know-how, commitment and creativity, safeguarding work, health and safety and ensuring a safe and secure working environment and conditions, as well as a system of values and principles founded on legality, transparency and sustainable development. Snam is committed to promoting the principles and contents of this policy, including through continuous training provided to Snam people and suppliers, with particular focus on aspects relating to health and safety, integrity and business ethics, inclusion and diversity and sustainability issues.

Snam's human rights policy aims to promote and defend the following principles, as essential prerequisites for conducting business activities:



- The provision of adequate standards of conduct for directors, statutory auditors, management, Snam employees, suppliers, subcontractors and all those who work to achieve Snam's objectives, as outlined in the Code of Ethics and other Company Guidelines, the cornerstone of the corporate culture;
- The recognition and protection of the right to freedom of association and the right to collective bargaining;
- The repudiation of all forms of corruption;
- The provision of equal opportunities for professional development and growth, by promoting a culture based on meritocracy and respect for people throughout the entire selection, management, development and career cycle.
- Fairness and equal access to the same remuneration for all its employees, regardless of gender, valorising their knowledge and professionalism.
- The prevention, repudiation and condemnation of:
 - (i) any form of discrimination based on ethnicity, nationality, language or religion, political or sexual orientation, gender, social background, age, disability or any other personal, cultural or professional sphere of the individual. With this in mind, Snam encourages and promotes inclusion and diversity in all company divisions;
 - (ii) any form of harassment, violence, threats, intimidation or sexual, psychological, physical or verbal abuse referring to the personal and cultural diversity of the individual, or behaviour that could be construed as persecution;
 - (iii) any forms of labour exploitation, including forced or child labour and trafficking of human beings, ensuring that no one is subject to any form of physical or psychological coercion or punishment;
- The confidentiality and processing of personal data of all those who work to achieve Snam's objectives in compliance with fundamental rights and freedoms, as well as the dignity of all those concerned.

Snam is committed to ensuring compliance with the provisions of the Declarations and Conventions to which it adheres, its Code of Ethics and this policy, including through actions and instruments enabling a transversal and inclusive assessment of the impact of risks and opportunities inherent to its business on human rights, in all their forms.

In this sense, the following should be referred to: (i) the "Ethics and Integrity Agreement" adopted by Snam so as to promote, including towards its suppliers and subcontractors, compliance with the principles and values considered essential for the company; (ii) the "Supplier Compliance Monitoring" process, based on which Snam extends the checks conducted for qualification purposes to HSEQ and financial aspects, as well as technical and reputational factors, specifically to gain a more complete view of the approach that its third parties adopt in dealing with aspects related to safety in the workplace and business sustainability/solidity.

Lastly, as indicated in the Guidelines "Anonymous and non-anonymous reports received by Snam and its subsidiaries", Snam has implemented a system for receiving, analysing



and processing whistleblowing reports regardless of who sent or communicated them, including in confidential or anonymous form, to such purpose even appointing a person outside the company (Ombudsman).

Snam's human rights policy is communicated and disseminated within the organisation and among everyone dealing with Snam, with a view to transparency and collaboration. The policy is also made available to all interested parties on the snam.it website. The Company promotes communication and information activities for employees, to ensure the broadest knowledge and most effective application of this Policy.

Any alleged infringements of this policy may be reported in accordance with the Guidelines "“Anonymous and non-anonymous reports received by Snam and its subsidiaries". Any infringement of the principles contained in this policy is an infringement of the Code of Ethics and will be treated as provided for therein.

The established principles are reported and fully and clearly examined both in Snam's sustainability reports and in specific, publicly available, policies.

THE CHIEF EXECUTIVE OFFICER

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