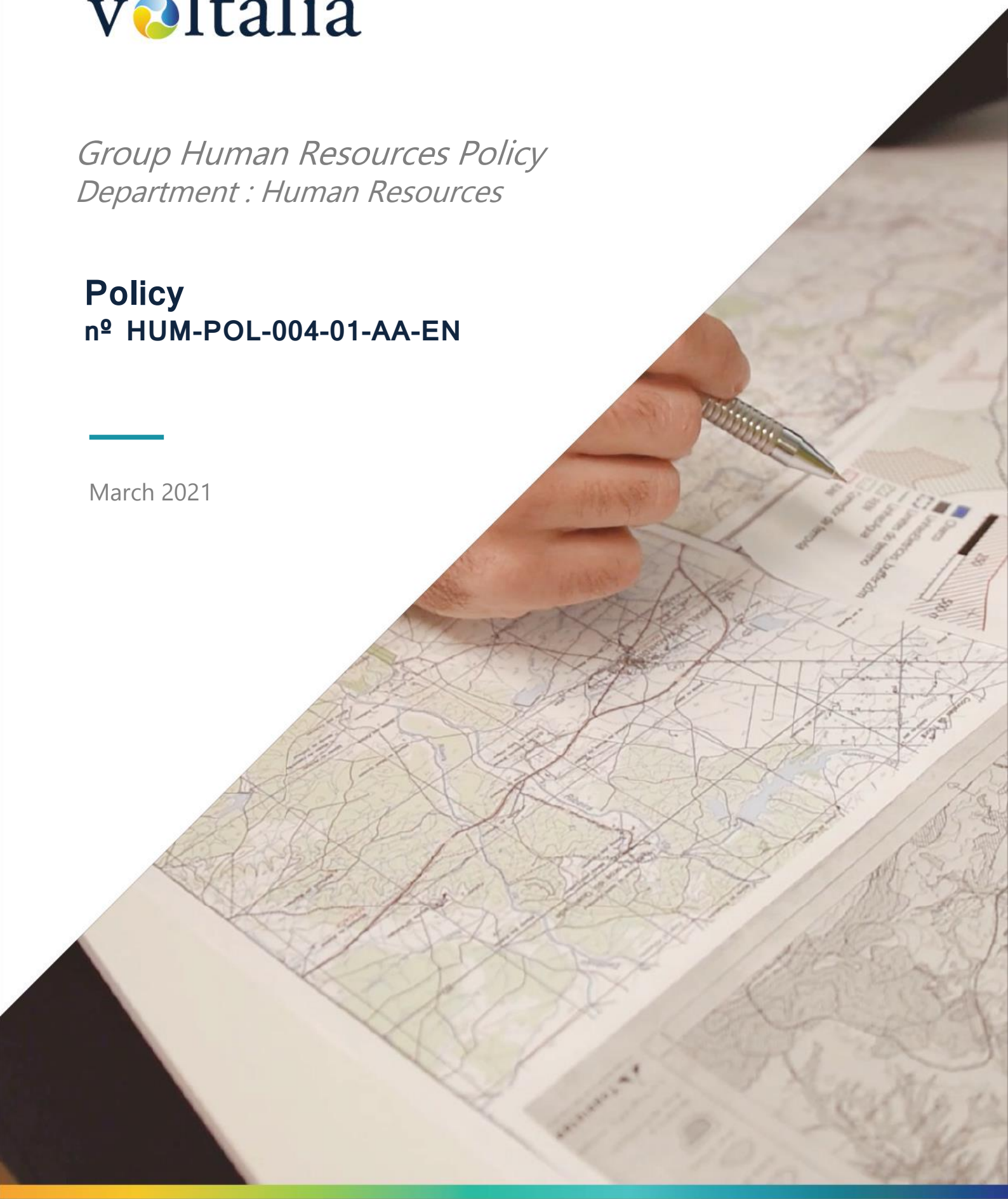




Group Human Resources Policy
Department : Human Resources

Policy
n° HUM-POL-004-01-AA-EN

March 2021



	NAME	FUNCTION	DATE
Elaborated by	Mariana Mendes	Group HR Manager	December 2020
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1 OBJECTIVE

The objective of this Policy is to share the Human Resources Group vision and main relevant aspects of the HR management and employee's best practices within Voltalia.

2 SCOPE

This Policy is aimed to be applied in all countries and companies of Voltalia Group.

3 COMMUNICATION

This Policy will be communicated to all employees through the intranet, My Voltalia, from March 2021.

4 RESPONSIBILITIES

The evolution and update of this Policy are under the responsibility of Group Human Resources team. The application of the contents and its implementation is the responsibility of all Human Resources teams and all management teams.

5 DESCRIPTION OF THE POLICY

Human Resources purpose

Voltalia is a people-centered group and this reflects the size and the way the Humans Resources teams work. The local HR organization will depend on the size of the countries and offices.

HR team purpose is to support the business, the employees, and the managers throughout the Group. The existent processes and tools give a direction and a frame but should not be used in detriment of the human dimension. This dimension should be present at all times and in all circumstances.

HR team should work in close cooperation with business and aims to be a credible and trusted partner. The main role of the team is to add value to the company's business by providing operational support and playing a proactive part in every situation where its contribution is needed.

The human dimension is clearly a key factor to Voltalia success. In this sense the HR team plays a critical role in the design and implementation of Human Resources strategies, policies and

processes that impact the Group's results as well as the overall reputation and effectiveness of the company.

Shared Responsibility

Every employee has a personal responsibility in the way she/he cooperates with people, as a team leader or as a colleague. The Human Resources managers and their teams are there to support solving professional issues, but they do not take the place of the competent manager.

HR's first responsibility is to actively contribute to the quality of human resources management throughout the company by proposing appropriate policies and then ensuring that they are applied consistently and equitably. As member of the company, the Human Resources teams provide advice and propose solutions that impact positively on the company's efficiency. They also recommend measures to answer to specific situations, while providing quality support and advice to her/his colleagues. In case of disputes, the Human Resources team will ensure that they are handled impartially and that each party has the opportunity to explain their point of view, regardless of their level of authority.

Together, HR and managers act as co-responsible partners for all Human Resources matters. This partnership is essential for effective Human Resources management.

Voltalia Spirit

Voltalia's mission, Values and Leadership Dimensions are aligned with our corporate culture. This Human Resources Policy translates each of these elements into the way we see our people and the human relations in the Group.

Any form of intolerance, harassment or discrimination will not be accepted in the Group. Any non-compliant action or decision are inadmissible as they hurt a fundamental value: **Integrity**. In the event of disagreement between two people, each must be given a fair respectful hearing. These principles are without exception and must be applied at all levels and in all situations.

At Voltalia, **Exemplarity** is an essential dimension and it is demonstrated by respectful, transparent and fair behavior and in the decisions taken in a daily basis.

Trust and communication are key for a good working relationship and they are the basis of the **Empowerment** at Voltalia. The ability to create a trustful environment allows one to learn, take risks and assume responsibilities. Without this, it is impossible to effectively delegate, to increase one's knowledge.

Effective communication plays a key role on a feedback process based on facts and open dialogue where both sides listen and share with transparency. Every employee is entitled to have open conversations with managers and peers. Combined, trust and communication are the sound basis for continuous improvement.

Ingeniosity is a key element to be a successful player in the fast growing and challenging environment that Voltalia faces. The knowledge and understanding of the company's **Vision** and objectives, the understanding on how each one contributes to business's success at their level are essential to identify together the path and the means to get there.

Voltalia's **Entrepreneurial** mind set is a driver in the Group. It means stimulating **Creativity** and specially giving up any judgments; sharing ideas and being opened to listen. These ingredients are crucial in the search for successful solutions, innovation and new business opportunities.

Willingness to cooperate and help others is a requirement for goal's achievement. This **Team Spirit** cross the boundaries of the teams, Business lines and countries. It shows that Group and Company interest take over individual ones and create space for a collective construction.

To join us

The long-term success of our company depends on our ability to attract, retain and develop employees capable of ensuring our growth on a consistent basis. Therefore, we search for people with whom Voltalia can build long-term relationships. This important responsibility is shared with each manager in the Group.

Voltalia's engagement is to provide equal treatment and opportunity and not discriminate any employee or candidate that submits applications to the positions available in the Group. No candidate or employee will receive less favorable treatment than other based on gender, sexual orientation, marital status, union membership, race, color, religion, religious belief, national/ethnic origin, age or disability.

Our policy is to prioritize internal recruitment whenever it is possible, giving the opportunity to our employees to develop new skills, embrace new challenges and grow in the company. Nevertheless, managers and Human Resources teams must take an interest in valuable candidates from outside the company and compare internal skills with external applications.

In any case, internal or external recruitments, we aim to recruit people based on their knowledge, qualifications, experience and skills. The potential to develop within the company is also an important criterion.

New employees in the company are full-fledged members of the corporate culture and a true commitment with the organization is expected. Hence a relevant aspect during the recruitment process is the alignment with Voltalia's culture and values. A special attention is paid to the alignment between the qualities of a candidate and the company's values.

The communication around the companies Values, Leadership Dimensions and culture must take place in the beginning of the recruitment process and those who are not willing to join these principles cannot be part of the company. In which regards management positions qualities based on our Leadership Dimensions are expected in addition to business requirements.

With the purpose of promoting the company's optimal visibility to potential candidates, Voltalia will ensure its presence in the social media, schools related partnerships and events and will be engaged in specific recruitment campaigns. Voltalia welcome and appreciates each application received and a particular care will be taken in processing each application, regardless of the outcome of the selection process.

The final decision when choosing a candidate or employee to take a specific position belongs to the manager, assisted by the Human Resources team. Under no circumstances this decision is made by an external person to the company (consultants, external experts or others).

At Voltalia, the onboarding of new employees is as important as the selection process. Newcomers must be welcomed in such a way that they are able to understand the organization and their role in a fast pace. Their skills and personality should blend naturally into the company's culture. In the same way, newcomers are expected to immediately respect Voltalia's culture. All employees must be open-minded towards new ideas and proposals coming from them.

Being a Voltalian

Engagement

The Voltalia group fully supports and respects the international principles and conventions on employee rights, protection against child labor, social dialogue and other important issues. At Voltalia, we are engaged not to hire young people under 16 years old and any employment of 16 to 18-year-old young people will be specially followed up. These principles must be fulfilled everywhere, under all circumstances and at all levels. Management will implement the necessary processes to ensure this.

Employees who do not comply with Voltalia Group Ethics Guide and Code of Conduct, and the Voltalia Leadership Dimensions will not be able to continue in their jobs and will be required to leave the company. In addition, our major suppliers and external service providers must be aware of and comply with our Ethics Guide and Code of Conduct.

Voltalia provides a work environment that protects the health and well-being of its employees. Health, safety and security are subjects of highest importance in the Group. Each one is responsible and must ensure his or her own safety as well as that of his or her colleagues and for this Voltalia's Health & Safety policy and processes must be fully respected. Any suggestion and improvement proposals are welcome and will be treated with the greatest attention.

No discrimination related to the origin, nationality, religion, race, gender, disability or age of an employee will be allowed within the company. In addition to that, any form of moral or sexual harassment will not only be prohibited but actively identified and banished. Internal local rules aligned with local regulations will address harassment and discrimination issues, and a particular attention will be dedicated to the prevention level. Build respectful and trustful relationships at all levels of the company and the manager's understanding of how their teams feel at work are attitudes related to this prevention.

We believe that every person working in the company should feel free to speak up about any situation raising their concern or bringing them discomfort in their work environment (harassment, discrimination, compliance, etc.). For that purpose, employees can issue alerts following their local rules, either by directly expressing their concerns to whom has the means to take action: their managers, their local HR department or the employees' representatives.

Whereas Voltalia understands that it is sometimes difficult to raise sensitive workplace issues, an additional manner of alerting is available all throughout the Group. This alert mechanism allows employees to use an external platform to report their concerns whilst protecting their identity and confidentiality. The platform is available 24/7 worldwide and the scope of alerts covers:

- a crime or an offence;
- a clear and serious breach of the law or regulations;
- a behavior or situations contrary to Voltalia's Code of Conduct; or
- any threat or serious detriment to the corporate interest.

At Voltalia it is accepted that employees have family bonds or couple relationship, nevertheless the employees that have extra-professional bonds should not work in on the same team and cannot have a hierarchical relation in the company or in general shall refrain from finding themselves in any potential situation of conflicts of interest.

Voltalia privileges a long-term hiring of employees whenever it is possible. Nevertheless, if it is no longer possible to maintain an activity within the Group, reasonable steps will be taken to avoid collective layoffs. Otherwise, if this is unavoidable, a redundancy plan will be elaborated, considering the legitimate interests of the employees and the local legislation. Efforts will be made to reduce, as far as possible, the negative social impact of such a situation.

Balance between work and private life

At Volitalia, we believe that our employees should have a good balance between work and private life. This balance increases satisfaction, loyalty and improves productivity. It also helps to attract and retain employees, and to align economic imperatives and well-being.

Volitalia is willing to support employees who wish to take an active part in community life or volunteer in social organizations. It is reminded that any activity performed during working hours must be submitted to the company's prior approval. In the same sense, Volitalia favors flexible working conditions whenever it is possible and supports its employees to have interests and motivations outside of their professional life.

Each Volitalia country organizes the work in the offices and in the field taking in consideration the business needs. Volitalia is engaged to respect local legislation related to working hours and to overtime. In very specific cases the managers may formally ask the employees to work overtime. In the case being the employee will be compensated for eventual overtime in the respect of local legislation.

Compensation and Benefits

Volitalia offers fair and equitable compensation for each type of work and location, taking into account internal equity. This compensation includes a fixed salary, a variable part and benefits according to the local market and practices. The variable part of the compensation has individual, team and Group components. The company may participate to surveys to gather relevant information on national compensation levels.

Volitalia has implemented an Annual Compensation Review process that aims to analyze the level of compensation of each employee. The company cares to ensure employees receive equivalent compensation for an equivalent added value. Thus, the compensation evolution in the company depends on the employees' results and productivity.

At an individual level, it is the responsibility of each manager to offer or not compensation increases for her/his employees based on the framework given by the company, considering the local market average salaries, individual performance, skills and development opportunities.

Each manager has also the responsibility to communicate the compensation to each member of her/his team in an appropriate, clear and transparent manner, considering the professional performance and specific responsibilities of the concerned employee. The quality of communication at this moment is essential to maintain a good dialogue with his or her employees on compensation issues.

The Human Resources team is available to support the managers at any moment and in the needed cases. They also must ensure that the compensation guidelines are applied fairly throughout the company. Although compensation is an important subject for each employee, it remains only one of the levers for motivation.

Training

Training is an important part of our corporate culture. Every employee, at all levels, should understand the need of constantly improve his or her knowledge and skills. Therefore, it is essential to be committed to learning in order to be part of Volitalia team. To that effect, managers should follow up and support his or her teams and help them to progress in their position.

To complete the on job learning process, training programs may be proposed to the employees with the objective to improve specific skills and competencies that are needed immediately or to be used in a very near future.

For this effect, a training plan is elaborated by the manager along with each member of her/his team in a yearly basis. The training plan is discussed and validated with the Human Resources team taking into account the business priorities and the budget assigned by the company. Training sessions may be proposed internally or externally according to the resources available on each country.

At Voltalia, knowledge management is a key aspect for the success of our business. Voltalia Academy has been created and it aims to consolidate and share knowledge within the Group by creating internal training programs, enhancing technology awareness, and developing and sharing best practices. These actions reinforce a knowledge sharing culture and strengthen the cohesion, promoting the creation of a network of contacts throughout the Group.

Training sessions or programs should, as far as possible, be based on active learning. It is also important to take advantage of e-learning programs and new pedagogical methods that could complement or replace traditional training programs.

It is the responsibility of each manager to evaluate the progress her/his employees made following a training course.

Career and Development

Each employee is responsible for her/his own personal development. Still, the company seeks to provide opportunities for those with the willingness and potential to develop their skills.

Such opportunities consider the potential and the aspirations of each employee and should be discussed transparently. The company also encourages its employees to express their goals and expectations in an open dialogue. The main objective is to retain and motivate employees by offering them internal development possibilities and a long-term basis relationship.

Each manager at Voltalia is also in charge of preparing members of her/his team for taking more responsibility and to fulfill the development needs of the company. Constant dialogue, support and coaching are the best tools to increase performance and help employees improve their skills. Facing challenges, taking risks and allowing mistakes are part of the learning process when corrected and turned into positive experiences.

A formal Performance Appraisal evaluation should be carried out regularly and at least once a year. Its purpose is to provide feedback on the results achieved and future possibilities, as well as on other aspects of the employee's work, including the development of her/his skills. Positive and negative aspects of the results achieved should be discussed openly. Their evaluation should be based on facts rather than opinions. The evaluation will focus on previously determined objectives and the level of their achievement. It is the responsibility of each manager to effectively manage performance and lead their teams to achieve good performance rates. In addition, the managers are assessed on the Voltalia's Leadership Dimensions.

During the year, the necessary time should be devoted to monitoring and following up the progressive achievement of objectives. This monitoring is intended to stimulate performance and must take place in the context of an open dialogue based on mutual trust and a desire to progress. The focus will be on progressive improvement, appropriate training resources and the development of a stimulating work environment. Candidates for management positions must have clearly demonstrated their willingness and ability to apply the Voltalia Management and Leadership Dimensions.

Internal mobility (vertical mobility, horizontal mobility or international mobility) decisions are taken exclusively on the basis of an employee's competence, experience, performance, and potential, regardless of origin, race, nationality, gender, religion or age.

Flexibility is needed to maintain a certain professional evolution. Employees may be required to change positions and face new challenges. Managers, particularly those with international positions, may be asked to travel. International opportunities related to businesses needs and/or to increase expertise in specific area could be proposed to employees.

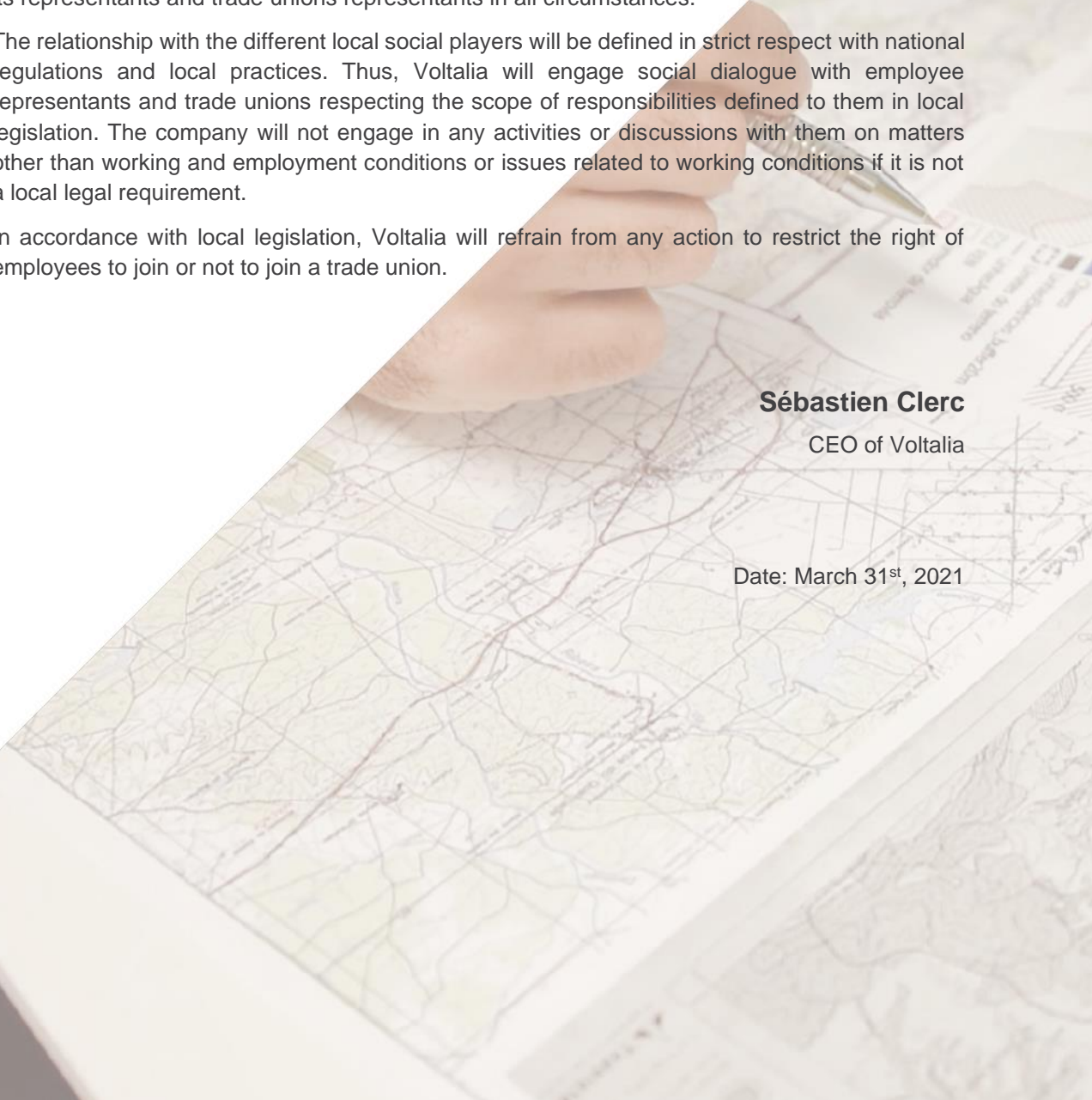
Social Dialogue

Voltalia guarantees its employees' freedom of association and the effective recognition of the right to collective bargaining. Voltalia also wishes, through its relations with trade unions and other representative associations, to support the company's long-term development, in the interests of both employees and the Group, by maintaining a level of competitiveness adapted to its economic environment.

Social dialogue is clearly the responsibility of local management and must respect the local legislation and practices. Voltalia is to ensure fluid and regular communication with employees, its representants and trade unions representants in all circumstances.

The relationship with the different local social players will be defined in strict respect with national regulations and local practices. Thus, Voltalia will engage social dialogue with employee representants and trade unions respecting the scope of responsibilities defined to them in local legislation. The company will not engage in any activities or discussions with them on matters other than working and employment conditions or issues related to working conditions if it is not a local legal requirement.

In accordance with local legislation, Voltalia will refrain from any action to restrict the right of employees to join or not to join a trade union.

A background image showing a hand holding a pen and pointing at a detailed map. The map is spread out on a surface, and the hand is positioned over a specific area, possibly indicating a location of interest. The map shows various roads, landmarks, and geographical features.

Sébastien Clerc

CEO of Voltalia

Date: March 31st, 2021