

Title	Global Human Rights Policy	
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Department Owner	Legal Department Policy	
Last Approved by:	Owner: Chris Ware; SVP, General Counsel, and Chief Compliance Officer, Legal Department	Date: 5/5/23
	Owner: Michel Cadieux, SVP Human Resources, HR Department	Date: 12/17/19

# History

Version	Modifications	Date
1.0	Initial Policy Release	2/5/21
1.1	Template and version control page update	8/23/22
1.2	Updated policy	5/5/23

## **Questions/Comments**

For further information or if you have questions about this policy, please contact <u>Compliance@itron.com</u>.



## **Our Approach**

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. Respect for human rights is rooted in our values and applies wherever we do business. Itron's Global Human Rights Policy (the "Policy") formalizes Itron's commitment to respect human rights and embodies common principles reflected in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, core International Labor Organization Conventions, the Organization for Economic Co-operation and Development Guidelines for multinational Enterprises, and the laws of the countries in which the company operates.

This Policy applies to all employees and contingent workers, our subsidiaries and their employees, and our business relationships, including our partners, agents, vendors, and suppliers. Itron has several additional policies that also guide our actions in specific areas such as supply chain, health, safety, and environmental, and privacy.

### **Global Human Rights Principles**

At Itron, we are committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products. In addition to Board level approval of the Policy and general oversight, as well as senior management approval and oversight, multiple teams throughout the company are responsible for implementing the Policy to address our salient human rights risks and support our adherence to the Policy. We assess human rights-related risks, review our policies, and seek input from stakeholders on our approach. We are committed to being responsible members of the communities in which we live and work.

## **Our Principles**

- Diversity and Nondiscrimination: Itron values diversity in our workforce, as well as in our customers, suppliers, and others and we are committed to creating an inclusive work environment where everyone is treated with dignity and respect. We provide equal employment opportunities for all applicants and employees. We do not discriminate on the basis of race, color, religion, religious creed, sex, age, national origin, ancestry, age, physical or mental disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by a local law, regulation, or ordinance.
- Harassment Prohibition: Itron employees are expected to treat co-workers, customers, partners, and suppliers with dignity. Itron is committed to providing a workplace free of sexual harassment as well as harassment based on factors such as race, color, religious creed, sex, national origin, ancestry, age, physical or mental disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual

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orientation, or any other characteristic protected by a local law, regulation, or ordinance. Itron will not tolerate harassment of employees by managers, coworkers, or our suppliers.

- Workplace Safety: At Itron, we operate in a diligent and responsible manner and promote a culture in which excellence in health and safety is a core value. We are committed to a safe and healthy workplace for our employees, our contractors, our vendors, our visitors, and our communities. We empower our workers to prevent hazards, promote a safe and healthy workplace, and committing ourselves to the vison of "Zero Injuries". (Refer to Itron's Corporate Health and Safety Global Vision and Policy Statements.)
- Prevention of Human Trafficking, Forced Labor, and Child Labor: Itron will not use or tolerate the
  use of forced, debt bonded, or indentured labor, involuntary prison labor, commercial sex, slavery,
  or human trafficking in our business or supply chain. We forbid harsh or inhumane treatment,
  including corporal punishment or the threat of corporal punishment. Itron also will not employ
  anyone under the age of 15 in any stage of manufacturing, and workers under the age of 18 should
  not perform hazardous work, overtime, or night shift work. Itron expects its suppliers to comply
  with these expectations. Additionally, Itron will not: destroy or conceal an employee's identity or
  immigration documents; employ misleading or fraudulent recruitment practices; misrepresent
  conditions of employment; or use recruiters who fail to comply with local labor laws.
- Working Hours and Minimum Wage Standards: Itron expects employee compensation to comply with applicable wage laws, including those related to minimum wages, overtime hours, and legally mandated benefits. Itron expects its suppliers to comply with these expectations.
- Freedom of Association/Collective Bargaining: Itron recognizes that in many of the locations where
  we operate, employees have the right to freely associate or not associate with third-party
  organizations such as labor organizations, along with the right to bargain or not bargain collectively
  in accordance with local laws. Itron respects those rights and is further committed to treating our
  employees with dignity and respect, and to create an environment of open communication where
  employees can speak with their managers about their ideas, concerns, or problems, and team
  together to address workplace issues. We encourage our employees to share their ideas, concerns,
  or suggestions through an environment of cooperation and teamwork.
- Product Responsibility: As the range of products and services we offer broadens and changes, we
  evaluate potential concerns about how technology products may be used to infringe on human
  rights. The challenges range from product misuse and limits on freedom of expression, to health
  and safety concerns that may arise from new technologies such as the Internet of Things. We
  continually review our policies and assessment processes to analyze these potential risks.
- Privacy: Itron is committed to protecting the privacy and personal information of our customers, employees, contractors, applicants, and associates. Itron's global data privacy policies and practices are designed to meet applicable regulatory requirements and to protect against unauthorized access, use, destruction, modification, or disclosure of personal information. For



more information on Itron's privacy policies and practices *see* the Itron Global Privacy Notice on our <u>website</u>.

- Environmental Stewardship: We support a proactive approach to the materials used in our products; strive to conserve energy, water, and other natural resources; and work to reduce the environmental impact of wastes generated and emissions to the air and discharges to water and land. Our commitment to environmental stewardship is embodied in Itron's Environmental/HSE policy and demonstrated through our annual Environmental, Social and Governance (ESG) report. Itron is committed to long-term sustainability in everything we do, including the impact our solutions make on the environment and the work we do in our communities. Our work has both a direct and indirect impact on many of the United Nations' sustainable development goals (SDGs), and we continuously strive to improve our results operationally and with the solutions we deliver that encourage conservation, promote sustainability and make our customers more efficient and effective while they manage the world's energy and water resources. Itron is a member of the U.N.'s global compact.
- Supplier Responsibility: As explained more fully in our <u>Supplier Code of Conduct</u>, Itron expects our suppliers to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes. Regarding responsible minerals sourcing, it is Itron's goal to use tantalum, tin, tungsten, and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region. Itron expects our suppliers to have in place policies and due diligence measures that will enable us to achieve this goal and our commitment as embodied in the Supplier Code of Conduct.

## Training

We regularly conduct training for employees on Itron policies and requirements, including mandatory annual training on our Code of Conduct and periodic training on our specific policies and policy elements.

#### **Reporting Processes**

We have implemented formal processes to enable anyone, including employees, contractors, subcontractors, agents, and other external stakeholders, to report human rights concerns through our third-party operated <u>ethics reporting portal</u>. We promptly investigate allegations and pursue action to mitigate any adverse human rights impacts. Itron does not tolerate retaliation against anyone who in good faith reports possible violations of law, the <u>Itron Code of Conduct</u>, or other company policies or procedures, questions ongoing or proposed conduct, or participates in an internal investigation.



### **Investigations and Audits**

Itron performs periodic targeted investigations and audits to verify that business is being conducted in compliance with this Policy and other Itron policies. All employees and third parties through whom Itron conducts business are required to fully and promptly cooperate with any auditors and investigators and must respond fully and truthfully to any inquiries and request for documents. Any failure to fully cooperate or hinder an investigation or audit may be grounds for contract termination or disciplinary action, up to and including termination, subject to applicable laws.

#### Summary

This policy is intended to succinctly express Itron's commitment to respect human rights on a worldwide basis. We are committed to continuous improvement in our performance, transparent communication, and to sharing the knowledge that we gain with our stakeholders, including employees, customers, suppliers, shareholders, and the communities in which we live and work.

#### Questions

Questions about this Policy should be directed to Itron's Global Compliance Team at <u>Compliance@itron.com</u>.