Global Human Rights Policy

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

• Workplace Safety: Itron is committed to providing a safe and healthy workplace for our employees, contractors, and communities. (Refer to Itron’s Corporate Health, Safety and Environmental (HSE) Global Vision and Policy Statement.) Itron will seek to provide a secure business environment for the protection of our employees, product, materials, equipment, systems, and information. We strive to comply with all
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applicable regulatory requirements as a minimum, and implement programs and processes to achieve greater protection, where appropriate.

- **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. (Refer to Itron Supplier Code of Conduct.) We forbid harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. Itron will also 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; nor 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 develops and facilitates global data privacy principles, policies, and procedures to adhere to applicable regulations and to protect against unauthorized access, use, destruction, modification, or disclosure of personal information. For more information on Itron’s privacy disclosures please see the Itron Global Privacy Notice on our website: https://www.itron.com/na/legal/privacy.

- **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 Corporate Sustainability Report. Itron recognizes that water is a critical natural resource that is of strategic importance to our business and the communities in which we operate. Itron is committed to respect the fundamental human right to water and has endorsed the UN Global Compact
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CE Water Mandate. We believe that climate change is a serious environmental, economic, and social challenge and is committed to taking action in this area.

- **Supplier Responsibility:** As explained more fully on our Supplier Code of Conduct, 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 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 ethics reporting portal (located at [www.itron.ethicspoint.com](http://www.itron.ethicspoint.com)). 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 Itron Code of Conduct, 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.