

ENEL S.p.A. ANTI-BRIBERY POLICY PURSUANT TO INTERNATIONAL STANDARD ISO 37001:2016

Enel SpA (the Company) is aware that corruption represents an obstacle to economic, political and social development and a heavy distortion of the rules, fairness and transparency of the markets.

Therefore, in carrying out its activities, the Company undertakes to fully comply with the principles of the “**Code of Ethics**” and the “**Zero Tolerance of Corruption Plan**” of the Enel Group, and of its “**Organisational Model pursuant to Italian Legislative Decree No 231**”, which, together with the “**Enel Global Compliance Program**” for non-Italian subsidiaries, constitute the pillars of its Anti-bribery Management System.

The Company also undertakes to pursue the following general **objectives** regarding **the prevention and fight against corruption**:

- the **absolute prohibition** of conducts that could be classified as corruption or attempted corruption;
- the strict **compliance with current legislation** related to the prevention and fight against corruption;
- the implementation of an **Anti-bribery Management System** in accordance with the **ISO 37001:2016** standard, as a defence against corruption and the continual improvement of Company activities;
 - the **encouragement of reporting** of suspected corrupt conducts and practices, providing employees and stakeholders with tools to report conducts not in line with corporate policies and ensuring whistleblower’s protection from any retaliation;
- the **sanctioning of any conduct that does not comply with the anti-bribery policy**, according to the Company’s disciplinary system;
 - the establishment of the **Anti-bribery Compliance Function**, composed by representatives of the Audit, Legal & Corporate Affairs and People & Organisation Functions (Quality Unit), who have the appropriate authority and independence;
- the **awareness and training** of Company employees on preventing corruption.

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