Responsible business conduct:
Enel’s approach to human rights
Responsible business conduct: Enel's approach to human rights
### Priorities

- Economic and financial value creation
- Engaging the local and global communities
- Employees management, development & motivation
- Occupational health and safety
- Sustainable supply chain

### Plan

**BACKBONES**

- Human rights

### SDG

<table>
<thead>
<tr>
<th>Tag</th>
<th>SDG</th>
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</thead>
<tbody>
<tr>
<td>16</td>
<td></td>
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<tr>
<td>17</td>
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</tbody>
</table>

### Activities

**Human rights due diligence**

- Implementation of the new phase of due diligence on the human rights management system
- Due diligence conducted on strategic assets in the countries of presence

**2021-2023 targets**

- In 2021: application of the site due diligence methodology to the pilot assets identified during the 2020 analysis
- In 2022: extension of the application of the site due diligence methodology; review of the due diligence on the human rights management system to enable the use of the new IT platform during the process
- In 2023: completion of the review of the due diligence on the human rights management system

**2021 results**

- Site due diligence:
  - Launched tool for Asset Level Human Rights Impact Assessment
  - Identified assets in pilot countries (Italy, Iberia, Chile, Colombia)

**Status**

- Definition of a strategic framework relating to the management of human rights in business operations, implementation of the ensuing action plans, analysis of the results and tailoring of the inputs to update the initial framework including any evolution of the international landscape

**Tag**

- S

**SDG**

- 16
- 17

(1) Due diligence activities at site level delayed because of Covid-19 pandemic situation.

### Goals

<table>
<thead>
<tr>
<th>Goals</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>New</td>
<td>Off track</td>
</tr>
<tr>
<td>Redefined</td>
<td>On track</td>
</tr>
<tr>
<td>Outdated</td>
<td>Achieved</td>
</tr>
</tbody>
</table>

### Responsible business conduct: Enel’s approach to human rights
Respecting human rights is a fundamental element to empower sustainable progress. Our business model aims at creating sustainable value jointly with our internal and external stakeholders, innovating, and pursuing excellence and leveraging the respect of human rights along the whole value chain of our business activities. Innovation and sustainability are inseparable parts of our strategy, together with the spirit of service and care for the well-being of people and the society in which we operate. Engaging the main external and internal stakeholders is a crucial element to enhance awareness and develop a constructive dialogue that can provide a valuable contribution to the current challenges posed by societal impacts of economy decarbonization. Indeed, we belong to the territory, and we are an essential element in the lives of people, businesses, and society at large and their needs and priorities are an essential input for processes and products innovation, as well as being crucial for a competitive, inclusive and sustainable business model aiming at generating positive impacts in society. This means rejecting harmful practices like modern slavery, forced labor, and human trafficking, to name a few, and promoting diversity, inclusion, and equal treatment and opportunity, and guaranteeing that people are treated fairly and valued for their uniqueness throughout the entire value chain of the businesses in which we operate. The main reference international standards underpinning our commitment are the United Nations “Protect, Respect and Remedy” framework outlined in its guiding principles on business and human rights and the OECD guidelines for multinational enterprises. Our commitment is transparently reflected in a specific policy on Human Rights developed and adopted as early as 2013. Such policy has been refreshed in 2021 to accommodate the evolution of the international reference frameworks and of our operating, organizational and management processes and strengthens and expands commitments already included in several codes of conduct like the Code of Ethics, Zero Tolerance for Corruption Plan and the global compliance models. The updated text has been approved by the Board of Directors of Enel SpA and subsequently adopted by its subsidiaries.

Engagement with our stakeholders, an essential element for all Enel’s activities, is at the core of the policy updating as well: we have, indeed, held a consultation in line with the “UN Global Compact Guide for business: how to develop a Human Rights Policy” and we have involved people within our organization, as well as suppliers, human rights experts, think tanks, NGOs, other companies.

We commit to respect such principles in any country where we operate, with due regard for the cultural, social, and economic diversities from one country to another and require that our stakeholders deal with us in accordance with them, with a particular attention to conflict affected and high-risk contexts.

The updated Policy identifies twelve principles, classified into two macro-issues: employment practices and community relations and society, and sets out how environmental degradation and climate change are intertwined with human rights since the implementation of measures to mitigate the effects of the former will happen only if their societal impact is taken into account. The included principles have been selected
based on their relevance to our business activities and relationships, as well as on the outcome of the above-mentioned consultation process.

The most relevant integrations are as follows:

- added introduction listing the connection of the principles with the broader industrial strategy and integration of the scope of application of the policy in terms of stakeholder categories most directly correlated to Enel’s value chain, specifically: any party with a direct or indirect interest in Enel Group’s business, such as customers, people working in the corporation, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them;
- strengthened the principles “Respect for diversity and non-discrimination” and “Health and safety”. The latter has been renamed “Health, safety and well-being” to accommodate the reference to the respect of physical and psychological well-being as well as the promotion of work-life integration behaviors; section, namely:
  - “Environment” since a safe, clean, healthy and sustainable environment is integral to the full enjoyment of a wide range of human rights. Such principle is aligned to the environmental policy and introduces the notion of respect of biodiversity;
  - “Respecting the rights of local communities” and “Respecting the rights of indigenous and tribal peoples” (the latter, according to with ILO Convention n. 169), which were formerly included in the broader “Respecting the rights of communities” principle;
  - splitting of the “Privacy and communications” principle in two separate ones, “Privacy” and “Communications” and strengthening of the messages of both as well as elaborating on their correlation with our customers in more detail.

In line with the UN Guiding Principles for Business and Human Rights we have a grievance mechanism in place to which stakeholders, whether internal or external, believing a violation might have occurred may resort.

Analysis of grievances is carried out by our Audit Function contacts, if necessary, the person who has filed it and the person responsible of the alleged violation, ensuring uniform treatment at Group level, in compliance with Company policies and local regulations. Whenever, following a grievance, a violation of the principles contained in the Human Rights Policy is ascertained, the relevant procedure provided for in the Code of Ethics is implemented.

We ensure that whistleblowers are not subject to any acts of retaliation and that their identity remains confidential, unless otherwise required by the law.

Any stakeholder who may be potentially affected has access to both digital and physical contact channels(10), which are also available for whistleblowing relating to potential violations of the Code of Ethics.

Moreover, we have grievance channels also at local level and this ensures accessibility to all potentially affected stakeholders in their own language.

For detailed info on 2021 data, please refer to the section “Stakeholder reports” included in the paragraph “Values and pillars of company ethics” of the chapter hereof.

We have committed to monitor the implementation of the policy i) through a specific due diligence(11) process, ii) the promotion of practices in line with a just and inclusive transition, and iii) by reporting evidence of improvement plan actions identified to prevent and remedy should critical issues occur.

Specifically, as required by the UN Guidelines and by the OECD Due Diligence Guidance for Responsible Business Conduct, we have developed a specific process of due diligence of human rights (described below). Such process covers the entire value chain across our geographic footprint and aims at identifying if any of our operating procedures and processes require an improvement plan to strengthen the management system that ensures we comply with the commitments undertaken in our Human Rights Policy.

Our commitment extends to supporting heightened responsible business conduct also through European reference organizations, like Eurelectric, the utility-sector one, through which, during 2021 we have participated in the public consultation process concerning the draft directive on mandatory Human Rights and Environmental Due Diligence and during 2022 we will contribute to its finalization.

Besides the management system due diligence process, we ensure that sustainability, and hence respect of our commitment in terms of human rights, is an integral part

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(10) Web or toll-free number shown on the Enel Code of Ethics web page or by writing to: Enel SpA - Audit Function - Code of Ethics. Via Dalmazia, 15 - 00198 Rome, Italy.

(11) In the context of the Guiding Principles on Business and Human Rights (Principles 17-21), this term refers to a continuously evolving management system implemented by a company, in accordance with the sector in which it works, its operating contexts, its organizational structure, to ensure it is not involved in human rights violations. This implies “identifying, preventing, mitigating and reporting” potential negative impacts deriving from the Company’s business activities.
of our corporate decision-making process thanks to an organizational and corporate governance model that sets out well-defined tasks and responsibilities of the main governance bodies. Namely:

- the Board of Directors, acting through the Control and Risks Committee and the Corporate Governance and Sustainability Committee which carry out preparatory work aimed at making proposals and providing advice, is responsible for examining the main company rules and procedures of relevance with respect to stakeholders and connected to the Internal Control and Risk Management System. These include our Human Rights Policy, our Code of Ethics, our Zero Tolerance for Corruption Plan and our global compliance models. Both committees are in charge of providing recommendations for changes to approval by the Board, if necessary, in order to bring such procedures in line with national and international best practices and with modifications in applicable laws and regulations;

- the Innovability® Function, and, namely, the Sustainability Planning and Performance Management and Human Rights unit, is responsible for:
  - managing the positioning on human rights and ensuring that it is correctly reflected in any internal and external communication activity;
  - integrating respect of the principles included in our human rights policy in corporate processes and planning and coordinating due diligence activities on the related management system, with the support of other units relevant to the process;
  - reporting to the Control and Risk Committee and to the Corporate Governance and the Sustainability Committee on the implementation of the due diligence process and on the management of human rights-related activities;
  - reporting annually within the Group’s Sustainability Report how we respect human rights based on the UN Guiding Principles Reporting Framework.
In line with the OECD Guidelines for Multinational Enterprises and the ensuing Due diligence Guidance for Responsible Business Conduct, we have set up a process that entails the following steps:

1. assessment of risk perceived by key stakeholders, at the individual country level, with regard to labor, local community, and environment-related rights;
2. gap analysis aimed at assessing our operating and risk monitoring processes and identifying any potential shortfall;
3. development of improvement plan actions to meet the gaps identified at step 2;
4. monitoring of the progress in implementing the remedies included in the improvement plan.

Thanks to the due diligence on our human rights management system we assess 100% of the policies and operating procedures put in place to identify the risks of our direct and indirect operations along our entire value chain and of our new business relations (e.g. acquisitions, mergers, joint ventures, etc.).

The process runs on three-year cycles and we are now in the 2020-2022 one. Worth noting is that the process was based on the text of the policy in force at the time the cycle started (2013 edition).

Hereafter, the outcome of step 1 and 2 for the current cycle:

1. Assessment of the perceived risk

A context analysis was run in 2020 in our countries of operation by consulting relevant stakeholders and experts in several fields, namely civil society, and academic institutions. Specifically, consultations involved direct and indirect workers, representatives of indigenous populations and local communities, trade unions and local institutions.
Consultation outcomes were then ranked based on the seriousness and the likelihood of a potential violation\(^{(12)}\). Hereafter, a summary of the most significant results:

- risks connected to bribery practices and impact on the environment ranked as “high-priority”;
- risks connected to labor practices violations (freedom of association and collective bargaining, rejection of forced and child labor, just and favorable working conditions, health and safety in the workplace, diversity, and inclusion) and to potential impacts on local communities ranked as “to be monitored”.

Protection of local communities rights ranked higher in Latin American countries, confirming the results of the previous cycle, given the widespread presence of such groups in that geographical region.

2. Gap analysis

Practices and policies adopted to respect human rights across our geographic footprint were then assessed based on the outcome at step 1. This entailed interviewing the Top Management of the Group as well as assessing the value chain against more than 100 indicators.

The assessment was based on the four parameters of the UNGP operating principles:

- public commitment to protect human rights;
- adoption of human rights due diligence process;
- preparation of a plan of action to remedy any gaps identified by the due diligence process;
- adaptation to match local context and regulations.

Briefly, the results of the due diligence highlighted we have in place a robust set of mechanisms and management systems to protect against possible human rights violations, which translates into an adequate level of management of identified risks.

<table>
<thead>
<tr>
<th>Topics</th>
<th>Average perceived risk</th>
<th>System to protect human rights</th>
<th>Main policies and procedures to protect human rights</th>
<th>SDG</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Labor practices</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Freedom of association</td>
<td>to control</td>
<td>Robust</td>
<td>Enel is committed to respecting the freedom and collective bargaining rights of its workers. In particular, Enel recognizes their right to set up or join organizations formed to defend and promote their interests; it recognizes their right to representation by union organizations or other forms of representation, opposing any action of discrimination in the exercise of this right; it recognizes their right to engage in collective bargaining as the preferred instrument to establish the contractual conditions and to regulate relations between company management and trade unions.</td>
<td>8</td>
</tr>
<tr>
<td>and collective bargaining</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Rejection of forced labor</td>
<td>to control</td>
<td>Robust</td>
<td>The contracts considered overall regulate labor conditions, clearly defining workers’ rights (working hours, remuneration, overtime, indemnity, benefits). Each worker is guaranteed a translated employment contract in his/her native language.</td>
<td>8</td>
</tr>
<tr>
<td>Fair and favorable working</td>
<td>to control</td>
<td>Robust</td>
<td>Human resources management systems and procedures guarantee the absence of minors in the workforce.</td>
<td>8</td>
</tr>
<tr>
<td>conditions</td>
<td></td>
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<tr>
<td>Rejection of child labor</td>
<td>to control</td>
<td>Robust</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Diversity and inclusion</td>
<td>to control</td>
<td>Robust</td>
<td>For details, consult the “Enel people” chapter.</td>
<td>5, 10</td>
</tr>
<tr>
<td>Health and safety</td>
<td>to control</td>
<td>Robust</td>
<td>For details, consult the “Occupational health and safety” chapter.</td>
<td>3</td>
</tr>
<tr>
<td><strong>Community and society</strong></td>
<td></td>
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</tr>
<tr>
<td>Community relations</td>
<td>to control</td>
<td>Robust</td>
<td>For details, consult the “Local and global communities” chapter.</td>
<td>1, 3, 4, 5, 7, 9, 10</td>
</tr>
<tr>
<td>Environmental impacts</td>
<td>high priority</td>
<td>Robust</td>
<td>For details, consult the “Towards a nature-based model” chapter.</td>
<td>13</td>
</tr>
<tr>
<td>Corruption</td>
<td>high priority</td>
<td>Robust</td>
<td>For details, consult the “Active and passive anti-corruption” section.</td>
<td>16</td>
</tr>
</tbody>
</table>

Average perceived risk: average perceived risk levels identified in the countries under analysis.
Reference scale of risks: 1. high risk; 2. high-priority risk; 3. risk to control; 4. acceptable risk.
Reference scale of performance values: robust (75%-100%); good (50%-74%); sufficient (25%-49%); to be improved (0%-24%).

\(^{(12)}\) Risks are classified based on the assessment scale: acceptable risk (minimum level), risk to control, high-priority risk, high risk (maximum level).
3. Improvement plans

The residual risk identified at the previous steps led to the definition of the necessary remedies which were then included in the improvement plan both at country and at global level, therefore ensuring uniformity of processes and policies across the Group’s activities. Hereby a few examples of the actions defined:

- Italy: inclusion of the link to our Human Right Policy in the business development procedures of the country’s Infrastructure and Networks activity;
- Argentina and Russia: implementation of training and internal communication activities aimed at raising awareness on the importance of respecting the commitments included in the Human Rights Policy;
- Brazil: definition of an operating instruction to assess management of human rights of partners and sub-tier suppliers;
- Chile: i) implementation of a communication and awareness-raising campaign on the Human Rights Policy aimed at all relevant stakeholders; ii) making the policy available to all relevant stakeholders, with particular focus on those with no access to digital media (i.e. indigenous populations).

As for labor practices, the assessment revealed they are perceived as “low risk” given also the compliance of the related control measures and processes with our internal policies and with the main international standards. However, we identified several minor areas of improvement that are summarized in the table below.

<table>
<thead>
<tr>
<th>Topics</th>
<th>Business Lines</th>
<th>Countries</th>
<th>Areas of Improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Freedom of association and collective bargaining</td>
<td>Sustainability/People and Organization</td>
<td>Greece, Australia, India, Brazil</td>
<td>Development of training programs on human rights aspects, with a special focus on the relationship with social partners and definition of working conditions during bargaining procedures</td>
</tr>
<tr>
<td>Rejection of forced labor</td>
<td>People and Organization/ Sustainability/ Communication</td>
<td>Romania, Brazil</td>
<td>Integration of control procedures and definition of further remedies in the case of intimidation and threats</td>
</tr>
<tr>
<td>Rejection of child labor</td>
<td>Global Procurement/ Legal and Corporate Affairs</td>
<td>Russia, Chile, Brazil</td>
<td>Intensification of training and monitoring of the supply chain</td>
</tr>
<tr>
<td>Diversity(13)</td>
<td>Sustainability, People and Organization</td>
<td>Mexico, Romania, Brazil</td>
<td>Each action plan includes activities on the topic of disability based on the main findings resulting from the Value for Disability project</td>
</tr>
</tbody>
</table>

The consolidated improvement plan for the current cycle includes 170 actions, covering 100% of operations and sites, as already anticipated. Implementation started at the beginning of 2021 and at year closing we have achieved 43% of progress.

Once improvement plans will be fully achieved, we will carry out an assessment of their effectiveness. In 2022, we will also launch application of the human rights due diligence at site level in a few pilot countries.

Training

Training is fundamental to raise awareness and understanding of the relevance of respecting human rights while conducting business. That is why each year we carry out specific training on several sustainability topics, including human rights. During 2021, we delivered approximately 1.9 million training hours on sustainability topics (up by 28% compared to the previous year) covering 86.6% of our workers. Specifically, the courses mainly addressed environmental protection, occupational health and safety, diversity and inclusion, relationships with communities, and anticorruption, with an average of 28 hours of training per capita, up from 21.7 hours in 2020. We have also developed a digital training course on human rights to share experience and best practices that place respect of human rights at the core of corporate activities. In 2021, we delivered more than 7 thousand training hours on human rights topics.

(13) Diversity issues also include the assessment of aspects relating to equitable remuneration and non-discrimination.
Security and human rights

We are committed to conducting security operations while respecting human rights, in line with the voluntary principles on security and human rights.

That is why we require that private security forces working to protect Group personnel and property in the operating areas act in compliance with the applicable national laws and international rules and standards, while simultaneously encouraging public law enforcement agencies to act in the same manner” (principle 2.2.3 of our Human Rights Policy).

In general, according to national regulations, security services can be assigned only to public forces, or to private forces in the absence of legislative provisions.

We entrust security management to a dedicated unit at the holding level as well as to specific units in our countries of operation.

The main activities concern the collection and analysis of information for identifying potential security risks and how to manage them, in cooperation with all our Business Lines, reference institutions and other critical infrastructure operators.
Our pledge to respect human rights is the guiding principle that permeates all our activities and it is fully integrated into our corporate purpose and values, since we belong to the territory, and we are an essential element in the lives of people, businesses, and society at large.

With our commitment we are striving for sustainable progress, to make our company and the communities in which we operate more prosperous, more inclusive and more resilient, without leaving anyone behind. The issues and principles included in the Content Index refer to Enel’s Human Rights Policy available at the following link: https://www.enel.com/investors/sustainability/daily-commitment/human-rights.

<table>
<thead>
<tr>
<th>ISSUE</th>
<th>PRINCIPLE</th>
<th>DESCRIPTION</th>
<th>SDG</th>
<th>INTERNATIONAL REFERENCE STANDARDS</th>
<th>SUSTAINABILITY REPORT 2021: CHAPTERS/paragraphs</th>
</tr>
</thead>
</table>
| Employment practices| Rejection of forced or compulsory labor and child labor | Reject of the use of any form of forced or compulsory labor, of any form of slavery and human trafficking and of child labor | - United Nations Guiding Principles on Business and human rights  
- OECD guidelines for multinational enterprises  
- ILO Convention 29  
- United Nations Global Compact principles | OUR SUSTAINABLE PROGRESS - What is material for us?  
Our strategy for sustainable progress  
Our commitment to continuous improvement  
THE PATH TO NET-ZERO  
PROGRESS STARTS WITH PEOPLE - Enel people  
Suppliers  
GROWTH ACCELERATORS - Circular economy |
| Respect for diversity and non-discrimination | Diversity, inclusion, equal treatment and opportunity, working conditions respectful of personal dignity, creation of a working environment where people are treated fairly, valued for their uniqueness and not discriminated or subject to harassment, commitment to a just energy transition for everyone and attention to clients requests | - United Nations Guiding Principles on Business and human rights  
- OECD guidelines for multinational enterprises  
- ILO Conventions 100, 111, 190  
- United Nations Global Compact principles | OUR SUSTAINABLE PROGRESS - What is material for us?  
Our strategy for sustainable progress  
Our commitment to continuous improvement  
THE PATH TO NET-ZERO  
THE DECADE OF ELECTRIFICATION AND CUSTOMER CENTRICITY  
PROGRESS STARTS WITH PEOPLE - Enel people  
Local and global communities  
Suppliers |

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Letter to stakeholders

Our sustainable progress

Our performance

Appendix
<table>
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<tr>
<th>ISSUE</th>
<th>PRINCIPLE</th>
<th>DESCRIPTION</th>
<th>SDG</th>
<th>INTERNATIONAL REFERENCE STANDARDS</th>
<th>SUSTAINABILITY REPORT 2021: CHAPTERS/paragraphs</th>
</tr>
</thead>
</table>
| Employment practices       | Freedom of association and collective bargaining | Freedom to form or take part in organizations aimed at defending and promoting the rights of people, respect of their right to be represented by unions or other forms of representation, collective bargaining as the favored instrument for setting contractual conditions and regulating relations between management and unions | ![Image](image1.png) | • United Nations Guiding Principles on Business and human rights  
• OECD guidelines for multinational enterprises  
• ILO Conventions 87, 98, 154  
• United Nations Global Compact principles | OUR SUSTAINABLE PROGRESS -  
What is material for us?  
Our strategy for sustainable progress  
Our commitment to continuous improvement  
THE PATH TO NET-ZERO  
PROGRESS STARTS WITH PEOPLE - Enel people Suppliers |
| Health, safety, and well-being | Protection of health, safety and psychological, relational, and physical well-being of individuals; dissemination of such culture to ensure that workplaces are hazard-free and to promote behaviors oriented towards work-life integration | ![Image](image2.png) | • United Nations Guiding Principles on Business and human rights  
• OECD guidelines for multinational enterprises  
• ILO Conventions 155, 156, 187  
• United Nations Global Compact principles | OUR SUSTAINABLE PROGRESS -  
What is material for us?  
Our strategy for sustainable progress  
Our commitment to continuous improvement  
THE PATH TO NET-ZERO  
PROGRESS STARTS WITH PEOPLE - Enel people Suppliers  
ESG BACKBONES - Occupational health and safety |
| Just and favourable working conditions | Protection of the right to conditions that respect the health, safety, well-being and dignity of individuals, maximum working hours, daily and weekly rest periods and annual period of paid leave, and fair remuneration as well as equal pay for equal work for men and women, minimum compensation, and professional orientation and training | ![Image](image3.png) | • United Nations Guiding Principles on Business and human rights  
• OECD guidelines for multinational enterprises  
• ILO Conventions 100, 132, 155, 156, 187  
• United Nations Global Compact principles | OUR SUSTAINABLE PROGRESS -  
What is material for us?  
Our strategy for sustainable progress  
Our commitment to continuous improvement  
THE PATH TO NET-ZERO  
PROGRESS STARTS WITH PEOPLE - Enel people Suppliers |
| Communities and Society    | Environment                                    | Protection of the environment and biodiversity, climate action, and contribution to a sustainable economic development                                                                                      | ![Image](image4.png) | • United Nations Guiding Principles on Business and human rights  
• OECD guidelines for multinational enterprises  
• United Nations Global Compact principles | OUR SUSTAINABLE PROGRESS -  
What is material for us?  
Our strategy for sustainable progress  
Our commitment to continuous improvement  
THE PATH TO NET-ZERO  
PROGRESS STARTS WITH PEOPLE - Enel people Local and global communities Suppliers  
TOWARDS A “NATURE-BASED” MODEL  
GROWTH ACCELERATORS - Circular economy |
<table>
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<th>ISSUE</th>
<th>PRINCIPLE</th>
<th>DESCRIPTION</th>
<th>SDG</th>
<th>INTERNATIONAL REFERENCE STANDARDS</th>
<th>SUSTAINABILITY REPORT 2021: CHAPTERS/paragraphs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communities and Society</td>
<td>Respecting the rights of communities</td>
<td>Responsible community relations based on the assumption that individual conditions, economic and social development, and general well-being of collectivity are strictly connected. This includes conducting capital expenditure in a sustainable manner, promoting cultural, social and economic initiatives for affected local and national communities to advance social inclusion through education, training and access to energy. Commitment to ensure that products and services are designed to be accessible for all.</td>
<td></td>
<td>• United Nations Guiding Principles on Business and human rights • OECD guidelines for multinational enterprises • ILO Convention 169 • United Nations Global Compact principles</td>
<td>OUR SUSTAINABLE PROGRESS – What is material for us? Our strategy for sustainable progress Our commitment to continuous improvement THE PATH TO NET-ZERO THE DECADE OF ELECTRIFICATION AND CUSTOMER CENTRICITY PROGRESS STARTS WITH PEOPLE – Enel people Local and global communities Suppliers TOWARDS A “NATURE-BASED” MODEL GROWTH ACCELERATORS – Circular economy</td>
</tr>
<tr>
<td></td>
<td>Respecting the rights of local communities</td>
<td>Commitment to respecting the rights of local communities and to contribute to their economic and social growth also through collaborations with suppliers, contractors and partners that contribute to the social and economic development of the communities where we operate. This goes also through: promoting free, prior, and informed consultation activities and implementing social inclusion actions (local manpower, health and safety training, development of local projects – also in partnership with local organizations); taking into due account the environmental and social impact in the designing and construction of our infrastructure projects; requiring that private security forces protecting Group’s personnel and assets in operating areas act consistently with the applicable national law and regulation and international standards.</td>
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<tr>
<td></td>
<td>Respecting the rights of indigenous and tribal people</td>
<td>Specific commitment to pay particular attention to the most vulnerable communities, such as indigenous and tribal peoples, in case of developing new projects and to respect the United Nations Declaration of the rights of Indigenous Peoples.</td>
<td></td>
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<tr>
<td></td>
<td>Integrity: zero tolerance of corruption</td>
<td>Rejet of corruption in all its forms, both direct and indirect, since it is one of the factors undermining institutions and democracy, ethical values and justice, as well as the well-being and development of society.</td>
<td></td>
<td>• United Nations Guiding Principles on Business and human rights • OECD guidelines for multinational enterprises • United Nations Global Compact principles</td>
<td>OUR SUSTAINABLE PROGRESS – What is material for us? Our strategy for sustainable progress Our commitment to continuous improvement PROGRESS STARTS WITH PEOPLE – Enel people Suppliers ESG BACKBONES – Sound governance</td>
</tr>
<tr>
<td>ISSUE</td>
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<td>DESCRIPTION</td>
<td>SDG</td>
<td>INTERNATIONAL REFERENCE STANDARDS</td>
<td>SUSTAINABILITY REPORT 2021: CHAPTERS/paragraphs</td>
</tr>
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<td>-------------------------------------------------------------------------------------------------</td>
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<tr>
<td>Communities and Society</td>
<td>Privacy</td>
<td>Respect of the confidentiality and right to privacy of our stakeholders and to use correctly information and data relating to the people working in our organization, to our customers and to any other stakeholder; processing of data in compliance with the fundamental rights and the rights and principles recognized in law, notably respect for private and family life, home location details and communications, personal data protection, freedom of thought, conscience and religion, freedom of expression and information.</td>
<td>• United Nations Guiding Principles on Business and human rights</td>
<td>OUR SUSTAINABLE PROGRESS - What is material for us? Our strategy for sustainable progress Our commitment to continuous improvement THE DECADE OF ELECTRIFICATION AND CUSTOMER CENTRICITY PROGRESS STARTS WITH PEOPLE - Enel people Local and global communities Suppliers ESG BACKBONES - Sound governance</td>
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<td>Communication</td>
<td>Commitment to ensure that institutional and commercial communications are non-discriminatory and are respectful of different cultures, while also not adversely affecting the most vulnerable audiences, such as children and the elderly.</td>
<td>• United Nations Guiding Principles on Business and human rights</td>
<td>OUR SUSTAINABLE PROGRESS - What is material for us? Our strategy for sustainable progress Our commitment to continuous improvement THE DECADE OF ELECTRIFICATION AND CUSTOMER CENTRICITY PROGRESS STARTS WITH PEOPLE - Local and global communities Suppliers</td>
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Responsible business conduct: Enel’s approach to human rights
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<th>ISSUE</th>
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<th>DESCRIPTION</th>
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<th>INTERNATIONAL REFERENCE</th>
<th>SUSTAINABILITY REPORT 2021: CHAPTERS/paragraphs</th>
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<td>• OECD guidelines for multinational enterprises</td>
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<td>Due diligence of the management system</td>
<td>Identification, prevention and mitigation of the potential negative effects caused by business operations</td>
<td>Reporting to Control and Risk Committee and to Corporate Governance and Sustainability Committee about the implementation of the due diligence process</td>
<td>• United Nations Guiding Principles on Business and human rights</td>
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<td>Access to remedy</td>
<td>Access to specific grievance channels also at local level</td>
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<td>Transparency</td>
<td>Annual reporting, within the Sustainability Report, of the performance on the commitments undertaken through the human rights policy</td>
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WE EMPOWER SUSTAINABLE PROGRESS.