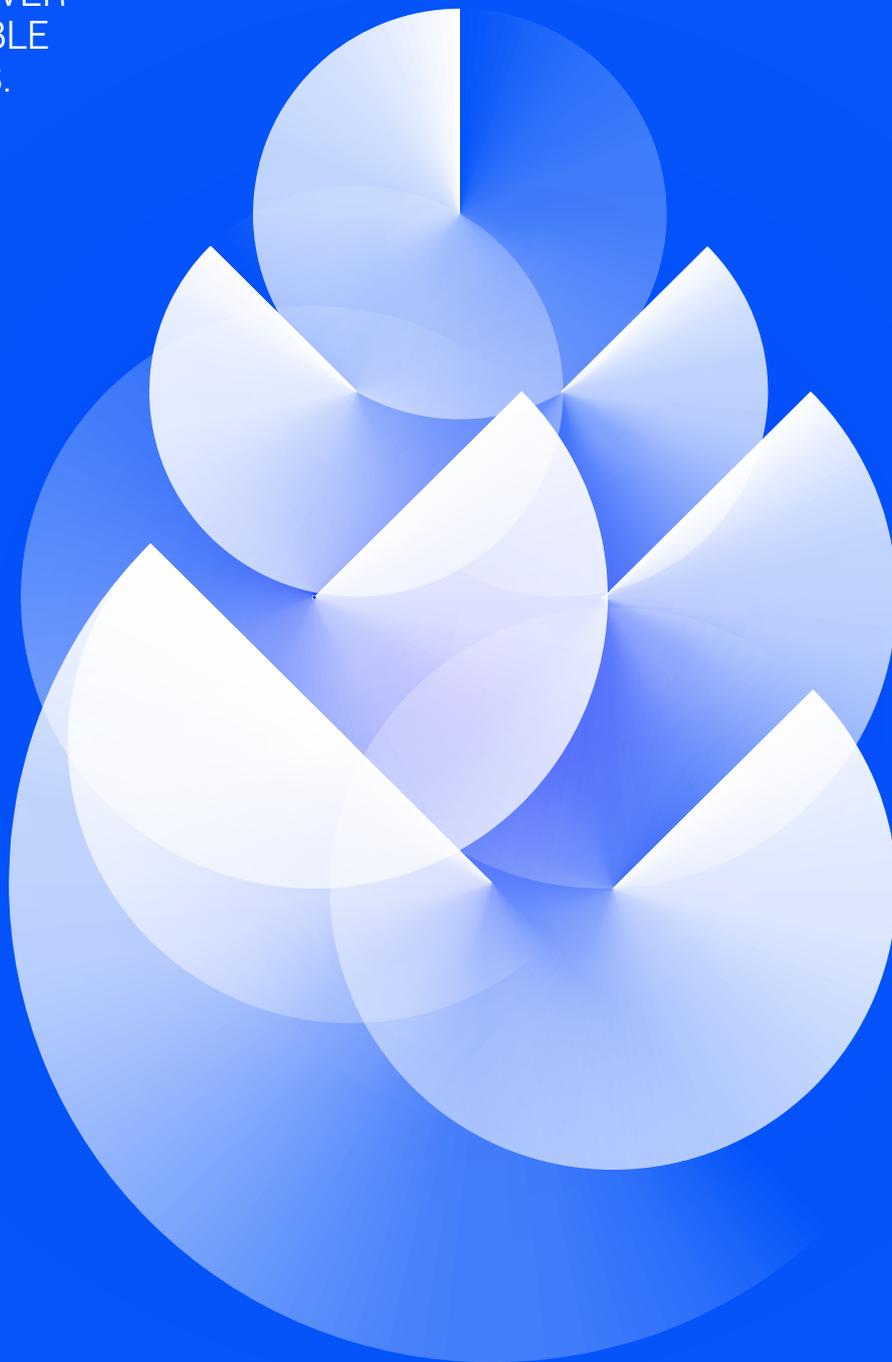


**OPEN  
POWER  
FOR A  
BRIGHTER  
FUTURE.**

WE EMPOWER  
SUSTAINABLE  
PROGRESS.



**Our performance 2022**  
Managing human rights

**enel**





# Our performance

## **Ambition of zero emissions and clean electrification**

lies at the heart of the strategy we are implementing in a sustainable and innovative way, to favor a **just transition**.

## **People are the mainstays of sustainable progress,**

not only ours, but also customers, suppliers, communities, institutions, the financial community, the media, companies and trade associations.

## **Innovation, circular economy, digitalization and sustainable finance**

are the growth accelerators, and embrace and enhance all strategic themes across the board.

## **Protection of nature and respect for human rights**

form our daily commitment to the current and future generations.

# Managing human rights

Material topics (I level)

Plan

SDG



- People management, development and motivation
- Sustainable supply chain



Below the 2022 results related to the targets of the previous 2022–2024 Sustainability Plan, the resulting progress and the targets of the 2023–2025 Sustainability Plan, which may be redefined, added to, or surpassed with respect to the previous Plan.

SDG	Activities	2022 results	Progress	2023–2025 targets	Tag
16 17	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	Definition of framework achieved through update of existing framework to keep abreast of the evolution of the international reference frameworks and of our operating, organizational and managerial processes	●●●	Implementation of action plans resulting from the definition of the strategic framework on human rights management in business operations, analysis of results, tailoring of the inputs and updating of the strategic framework (also in view of the evolution of the international context)	E S G

Managing human rights

For further information on the targets included in the Sustainability Plan, please refer to the Human Rights Content Index.

**Goals**

I Industrial   E Environmental   S Social  
G Governance   T Technological

+ New   ↻ Redefined   ⌚ Outdated

**Progress**

●●● Not in line   ●●● In line   ●●● Achieved  
 N.A. = not applicable



# Managing human rights



# Managing human rights

| 2-12 | 2-23 | 2-24 | 2-25 | 2-26 | 3-3 | 407-1 | 408-1 | 409-1 | 411-1 | 413-1 | 413-2 | 418-1 |

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.

We have adopted the approach of the UN Guiding Principles on Business and Human Rights, setting up a human rights management system based on three pillars:

## OUR COMMITMENT



It includes:

- our **strategic approach** to human rights in business operations
- our **public commitment**: the Human Rights Policy
- **embedding** of the commitment into:
  - operating policies and procedures
  - training topics and practices
- our **governance**

## OUR DUE DILIGENCE PROCESS



It includes:

- **identification** of salient issues
- **management** of salient issues
- **relationship with stakeholders** (workplace, procurement and business relationships, communities, customers and cross-cutting and specific issues)

## ACCESS TO REMEDY



It includes:

- our commitment to provide appropriate **remedy** in case of impacts
- **grievance** channels information
- **redressing** in legacy projects

## Our commitment

| 2-24 |

### Our strategic approach

Protection of the environment and natural resources, climate action, and contribution to a sustainable economic development are strategic factors in the planning and development of our operations, alongside our broader commitment to accelerate the decarbonization and electrification processes, in accordance with the Paris Agreement and the United Nations Sustainable Development Goals.

The mitigation of the effects of the increasing environmental degradation and of climate change cannot take place without taking into account their social impact and that is why we believe that transition to net zero should be fair and inclusive.

We measure our commitment by acting in such a way that those who work with us do so in just and favorable conditions, that their health, safety and wellbeing are pivotal to creating value and that the rights of the communities with which we interact, as well as those of our customers, are respected.

A strategic approach aimed not only at mitigating risks in a reactive way, but at managing them proactively by identifying the relative opportunities and exploiting the potential for growth and the creation of shared value.



**Ernesto Ciorra**

Chief Innovability® Officer

“ Respecting Human Rights is a fundamental element to empower sustainable progress.

We promote the growth of a **constructive dialogue** that can really help – in an effective way – **with tackling the challenges brought by the social impacts of decarbonization strategies in line with the Paris Agreement, and we have committed to a just transition that does not leave anyone behind.**

**Continuous innovation and embedding of circularity principles are also cornerstones for building a competitive, inclusive and sustainable business model.** Indeed, a sustainable business conduct based on international reference standards **is key to unlock multiple competitive advantages, such as increasing talent attraction & retention, strengthening corporate resilience, meeting customers & civil society expectations, improving access to stock & capital markets, shaping regulation & promoting system advocacy.**”



## Our public commitment: the Human Rights Policy

In 2013 Enel has adopted a Human Rights Policy, approved by the Board of Directors, which has been updated in 2021 to keep abreast of the evolution of the international reference frameworks and of our operating, organizational and managerial processes.

The Human Rights Policy leverages commitments already included in several codes of conduct like the Code of Ethics (adopted as early as 2002), the Zero Tolerance of Corruption Plan and the global compliance models while at the same time strengthening and expanding their content. The content of our policy refers to internationally recognized human rights as defined in the **International Bill of Human Rights** and in the **International Labor Organization conventions** underlying the **Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy** and applicable to business practice.

The commitment also reaches out to:

- the **10 Principles of the Global Compact** that we have joined as an active member since 2004;
- the **United Nations Pledge Letter** we signed in 2019, in which the United Nations asked companies around the world to commit to a just transition and the creation of decent green jobs (for further details, please refer to “Our commitment to a just transition: leaving no one behind”);
- the **United Nations “Protect, Respect and Remedy” framework**, set out in the guiding principles on business and human rights, and the **OECD guidelines for multinational enterprises**, two of the main international soft law reference standards.

The policy addresses **employment practices and community relations** and society through **12 principles**. Specifically, they establish our rejection of practices like modern slavery, forced labor, and human trafficking, to name a few, and our commitment to promoting diversity, inclusion, and equal treatment and opportunity, guaranteeing that peo-

ple are treated fairly and valued for their uniqueness, as well as focusing on protection of the environment since a safe, clean, healthy and sustainable environment is integral to the full enjoyment of a wide range of human rights.

The principles have been identified based on their relevance to our business activities and relationships, as well as on the outcome of a consultation held with relevant stakeholders (people within our organization, as well as suppliers, human rights experts, think tanks, NGOs, other companies) held in line with the “UN Global Compact Guide for business: how to develop a Human Rights Policy”. Listening and taking account of stakeholders’ perspectives in internal decision-making is, indeed, an integral part of our commitment to respecting human rights. For further details, please refer to “Materiality analysis process and results for 2022”, “Our commitment to a just transition: leaving no one behind” and “Engaging communities”.

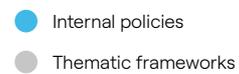
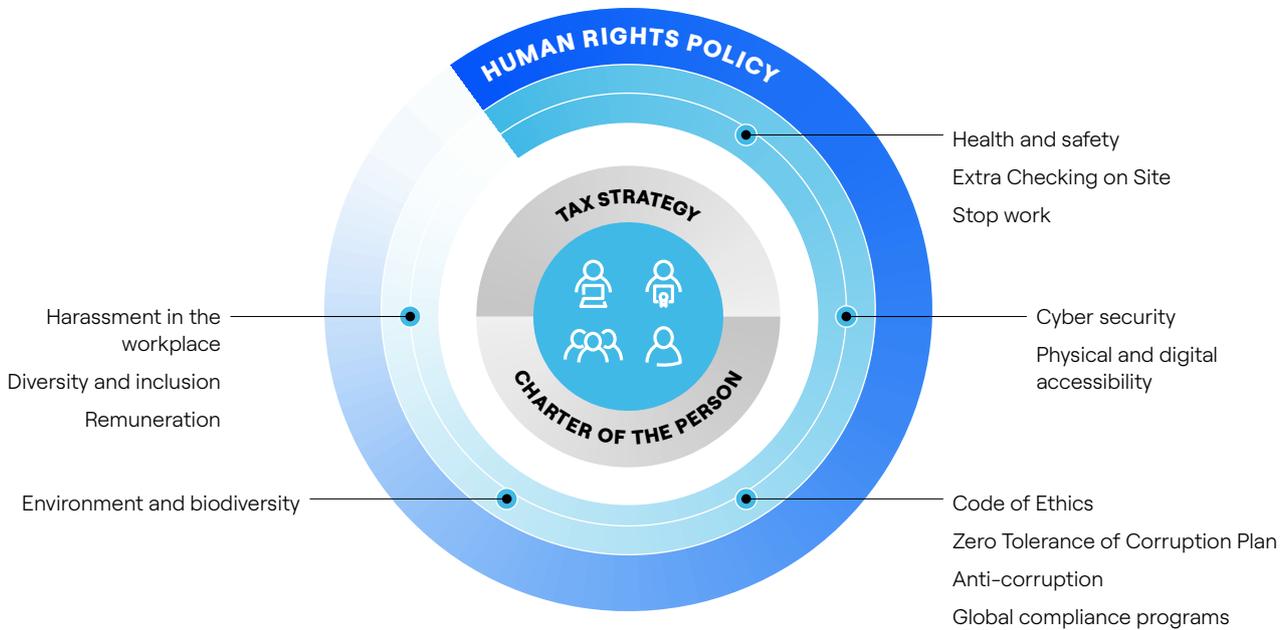
Our commitment extends to supporting heightened responsible business conduct also through European reference organizations, like **Eurelectric**, the utility-sector one, through which, during 2022 we have continued to participate to the process concerning the development of the draft Corporate Sustainability Due Diligence Directive (CSDDDD).

Other participations include the **Solar Stewardship Initiative**, launched by **Solar Power Europe**, the **Global Alliance for Sustainable Energy**, an independent global alliance, as well as the working groups within the **Just Transition Think Lab**, promoted by the **United Nations Global Compact**, the **Business Commission to Tackle Inequality** (BCTI), promoted by the **World Business Council for Sustainable Development** (WBCSD), and **CSR Europe Leaders Hub for an Inclusive Green Deal**, selected group of members of **CSR Europe**. For further details, please refer to “Our commitment to a just transition: leaving no one behind”.

## Policies and procedures

Integration of the commitment across relevant internal functions and processes is key to prevent and mitigate adverse human rights impacts as well as fostering decent work, inclusive economic growth and sustainable development.

Hereafter a summary classified by stakeholder and thematic group of the key internal policies and external frameworks integrating our Human Rights Policy.



## Security and human rights

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National regulations generally set for security services employed to protect companies' personnel or property that they are assigned only to public forces, or to private forces in the absence of legislative provisions.

In both cases, our commitment is to promote that security forces act in a way consistent with the applicable national laws and international rules and standards and in line with the voluntary principles on security and human rights (principle 2.2.3 of our Human Rights Policy).

Security services providers are selected following our overall procurement and monitoring process during the life of the contract and are therefore subject to the same ESG screening and contractual clauses as any other supplier. For further details, please refer to "Sustainable supply chain".

For providers included in the high reputational risk category, we also run additional checks regulated through a specific procedure (Counterparty Analysis), a further instrument in reducing and mitigating, as much as possible, actual or potential risks.

Overall security management is entrusted to a dedicated function at Group level (Global security) which acts in coordination with relevant security functions at country level. Main activities are collecting and analyzing information to map potential security risk and related management, also in cooperation with external stakeholders like reference institutions and other critical infrastructure operators.

As for protection services for Enel people travelling in high-risk countries, providers are selected based on specific contractual frameworks managed by the Global Security function.

## Training

| 2-29 |

Training and awareness-raising processes dedicated to both Enel people and business partners is a key part of embedding respect of human rights in business operations. Each year we carry out specific training to ensure that anyone working with us is aware of the role they play in ensuring respect of human rights while doing business. Such training also includes specific communication initiatives aimed at internal and external stakeholders to foster proper understanding of the commitment undertaken through the Human Rights Policy.

The training is deployed in different formats and content in order to meet every need, including:

- courses on environmental protection;
- courses on occupational health and safety;
- courses on diversity and inclusion;
- courses on relationships with communities;
- courses on anticorruption;
- digital training courses on issues closely linked with human rights;
- training initiatives on best practices closely linked with human rights.

## Governance

Respect of our commitment in terms of human rights is an integral part of our corporate decision-making process. We rely on an organizational and corporate governance model, based on principles of transparency and accountability, 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 of Corruption Plan and our global compliance models. Both committees are in charge of providing recommendations for changes to the Board for approval, if necessary, in order to bring such procedures in line with national and international best practices and with modifications in appli-

In 2022, 84% of Enel people attending courses on sustainability, confirming 2021 trend. Specifically, training hours were equal to approximately 1.9 million, with a per capita average of 28 hours. Training on human rights totaled some 7 thousand hours thanks to the online course that exemplifies the key role human rights play in business practice through simple stories and best practice sharing. On top of this, we run induction activities on human rights and business to selected audiences to promote internal awareness on our commitments and to stimulate improvement of its embedding into the operating practices. Activities for 2022 include:

- a training session within the Executive Procurement School, organized with the support of a leading university and dedicated to our global procurement talents;
- a deep-dive with all our country sustainability managers;
- a training session dedicated to a selection of people working with us in renewable operations.

cable laws and regulations;

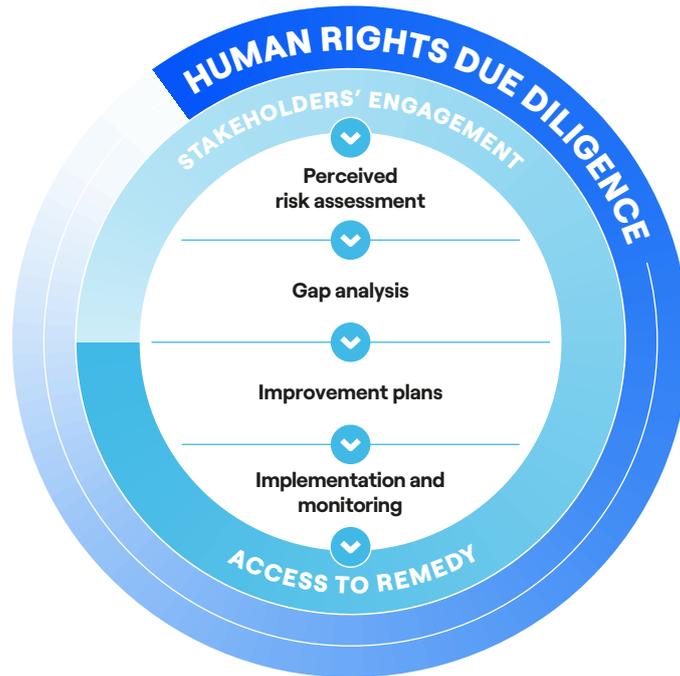
- the Innovability<sup>®</sup> Function and, namely, the Sustainability Planning and Performance Management and Human Rights unit, is responsible for:
  - managing the positioning on human rights and ensuring that it is correctly reflected in any internal and external communication activity;
  - integrating 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 commitments.

# Our process of due diligence

2-23

As required by the United Nations Guiding Principles on Business and human rights and by the OECD Due Diligence Guidance for Responsible Business Conduct, we have set up a process, which we have also codified in a global internal procedure, covering the entire value chain across our geographic footprint aimed 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 process runs on a three-year cycle format, and involves both internal stakeholders by country of operation and function and external ones through human rights experts and key stakeholders. We have just completed the 2020-2022 cycle.



## Perceived risk assessment (identification of salient issues)

Identification of salient human rights issues allows us to better understand where to focus our efforts and resources for the potential impacts that require the greatest urgency, taking into account the relevant stakeholders' perspective.

The 2020 assessment run in our countries of operation with regard to labor, local communities, and environment-related rights involved stakeholders and experts in several fields, including civil society, and academic institutions. Specifically, consultations were held with direct and indirect workers, representatives of indigenous populations and local communities, trade unions, local institu-

tions and peer companies.

Outcomes of the assessment were then plotted into a human rights risk heat map based on the severity and the likelihood of a potential violation.<sup>(1)</sup>

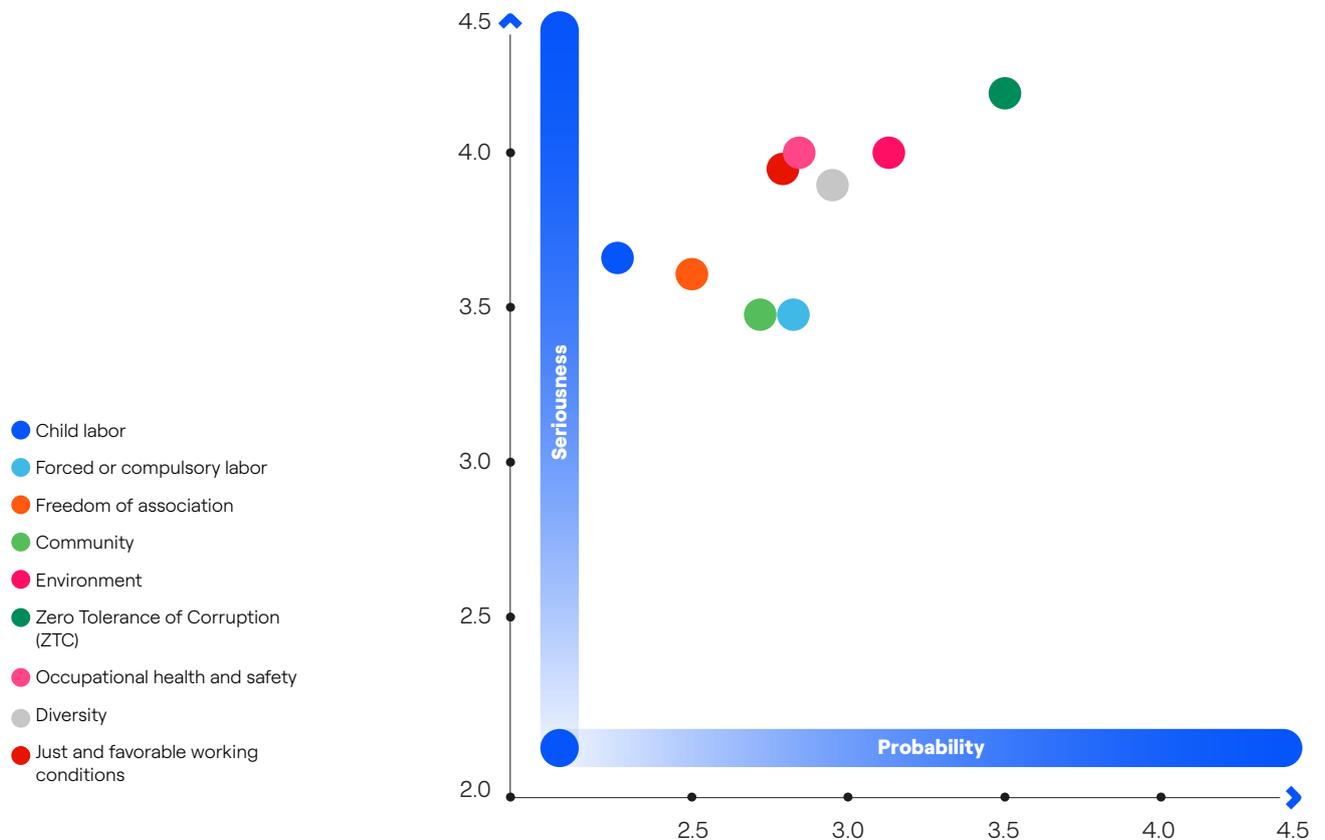
Hereafter, a summary of the most significant results:

- risks connected to bribery practices and to 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, occupational health and safety, diversity and inclusion) and to potential impacts on local communities

(1) Risks are classified based on the assessment scale: acceptable risk (minimum level), risk to control, high-priority risk, high risk (maximum level).

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.



In addition, we periodically engage with our stakeholders and sustainability experts through the materiality analysis, a process that allows to identify material topics, i.e., the most significant impacts of the company on economy,

environment, and people, including human rights impacts. For further details, please refer to “Materiality analysis process and results for 2022”.

## Management of salient issues

Besides the identification of salient issues, our management system includes:

1. a **gap analysis** aimed at assessing our operating and risk monitoring processes and identifying any potential shortfall;
2. development of **improvement plan** actions to meet the gaps identified at the previous step;
3. **implementation of actions** and **monitoring** of progress.

Thanks to this process 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.).

Hereafter, the main outcomes of the 2020–2022 cycle.

## Gap analysis

Practices and policies adopted to respect human rights across our geographic footprint were then assessed based on the human rights potential risks heatmap (please refer to “Assessment of perceived risk – identification of salient issues”) across relevant internal functions and processes to identify any existing gap.

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

- public commitment to respect 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.

This entailed interviewing the Top Management of the Group with the broad aim to get their strategic perspectives on business and human rights and assess awareness and perception of related risks and impacts and how they are managed.

Results highlighted that the **management system to potentially mitigate impacts is robust and should enable to adequately manage any identified risks**, which considering the United Nations Guiding Principles framework ranking definitions means **management of salient issues is adequate**.

Below, a summary of key evidence:

Human Rights Principles	SDG	Main policies and procedures to protect human rights	Average perceived risk	System to protect human rights
<b>Labor practices</b>				
Freedom of association and collective bargaining	8	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.	To control	Robust
Rejection of forced labor	8	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. Human resources management systems and procedures guarantee the absence of minors in the workforce. Also apprenticeship projects and school-work experience models are carried out.	To control	Robust
Just and favorable working conditions	8		To control	Robust
Rejection of child labor	8		To control	Robust
Diversity and inclusion	5 10	For details, please refer to "Empowering Enel people"	To control	Robust
Health and safety	3	For details, please refer to "Occupational health and safety"	To control	Robust
<b>Community and society</b>				
Community relations	1 3 4 5 7 9 10	For details, please refer to "Engaging communities"	To control	Robust
Environmental impacts	13	For details, please refer to "Conservation of natural capital"	High priority	Robust
Corruption	16	For details, please refer to "Values and pillars of corporate ethics"	High priority	Robust

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.

The results are expressed in percentage and represent the current maturity of the management systems with respect to the specific Human Rights areas.

Reference scale of performance values: Robust (75%-100%); Good (50%-74%); Sufficient (25%-49%); To be improved (0%-24%).

## Improvement plans

The residual risk identified at the previous step 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 Rights Policy in the local business development procedures of Enel Grids;
- Argentina and Russia<sup>(2)</sup>: 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.

Human Rights Principles	Business Lines	Countries	Areas of improvement
Freedom of association and collective bargaining	Sustainability/People and Organization	Greece, Australia, India, Brazil	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
Rejection of forced labor	People and Organization/Sustainability/Communications	Romania, Brazil	Integration of control procedures and definition of further remedies in the case of intimidation and threats
Rejection of child labor	Global Procurement/Legal and Corporate Affairs	Russia <sup>(2)</sup> , Chile, Brazil	Intensification of training and monitoring of the supply chain
Diversity <sup>(3)</sup>	Sustainability, People and Organization	Mexico, Romania, Brazil	Each action plan includes activities on the topic of disability based on the main findings resulting from the <b>Value for Disability</b> project

## Implementation and monitoring

**The consolidated improvement plan for the 2020-2022 cycle includes 170 actions, covering 100% of operations and sites. At the end of 2022, we have achieved over 80% of the plan.**

Full effectiveness of the actions implemented will be assessed through the gap analysis that we will be run in 2023 when the new cycle will begin. Worth noting is that the next cycle will be based on the refreshed Human Rights Policy content.

As a further tool to measure the effectiveness of our human rights management system and governance structure across operations, in 2022 we carried out an asset-level

due diligence activity on five pilot countries: Brazil, Chile, Colombia, Italy, Iberia.

Indeed, as instructed by the OECD Guidelines for multinational enterprises, in addition to standard assessments an enterprise may already employ, additional internal assessments may support a deeper understanding of the potential risks or actual adverse impacts with respect to an enterprise's own activities.

The outcome of the analysis confirmed the main results obtained by the overall due diligence process on the management system just described above in terms of robustness of labor practices issues and engagement with local communities. They also confirmed the key role awareness raising campaigns play.

(2) On October 12, 2022, the Group has closed the sale of its entire stake in PJSC Enel Russia.

(3) Diversity issues also include the assessment of aspects relating to equitable remuneration and non-discrimination.

## Relationships with stakeholders: human rights in practice

| 2-29 |

### The workplace

We are committed to respecting and promoting internationally recognized workers' rights in all the countries where we operate. 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.

All of this has also been codified into the Charter of the Person, a memorandum of understanding adopted in Italy in 2022 and agreed with some trade union organizations. The Charter of the Person originates in a cultural context of transformation in which individuals are becoming aware of the importance of human relationships as a true engine of full realization. In the work carried out with the trade unions we look for the first time at the worker, who is not only and merely passive subject of protection and recognition but an individual who, in a new awareness, pursues a renewed balance between all its needs and inclinations.

### Training and people empowerment | Upskilling and reskilling

(Human Rights Policy, "Employment practices", principle 2.1.5 "Just and favourable working conditions")

We believe in the importance of professional orientation and training for the development of our people and their skills, even the more so in situations impacted by the energy transition that prompt requalification and enhancement of potential by way of reskilling and upskilling programs to foster a just transition.

Facing the undergoing rapid evolutions means setting up an inclusive working environment, aimed at enhancing the human being by placing him at the center of an ecosystem in which lifelong learning, well-being, productivity and safety can reinforce each other, contributing to the fullest realization of the person, in a perspective of ever greater centrality.

For further detail, please refer to "Our commitment to a just transition: leaving no one behind".

### Inclusion

(Human Rights Policy, "Employment practices", principle 2.1.2 "Respect for diversity and non-discrimination")

We promote principles of diversity, inclusion, and equal treatment and opportunity, and we are committed to guaranteeing the right to working conditions that are respectful of personal dignity, as well as creating a working environment where people are treated fairly and valued for their uniqueness. We are committed to protecting the physical and psychological integrity and individuality of each person, and we oppose all forms of behavior that result in discrimination in relation to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and all other forms of individual diversity, or that is detrimental to the person and their convictions or preferences. Accordingly, we promote people's freedom of expression. We do not tolerate physical, verbal, visual, sexual, or psychological harassment such that results in a working environment that is denigrating, hostile, humiliating, intimidating, offensive, or unsafe.

For further detail, please refer to "Empowering Enel people" and the "Value for Disability" box in this chapter.

### Health & Safety and well-being

(Human Rights Policy, "Employment practices", principle 2.1.4 "Health, safety and well-being")

We consider health, safety, and psychological, relational, and physical well-being of individuals as the most precious asset to be protected in any moment, at work, as well as at home and during leisure time. We commit to disseminating a robust health, safety, and well-being culture across our organization, to ensure that workplaces are free from health and safety hazards and to promoting behaviors oriented towards work-life integration. We actively commit to foster personal and organizational well-being that are enablers of the engagement and innovative potential of people. We do, so, for example, by providing benefits and services that support the integration of private and working life (for example, support, including financial one, for childcare and maternity or for the care of the elderly).

For further detail, please refer to "Empowering Enel people" and "Occupational health and safety".

## Industrial relations

(Human Rights Policy, “Employment practices”, principle 2.1.3 “Freedom of association and collective bargaining”)

We protect the right of the people working with us to form or take part in organizations aimed at defending and promoting their interests. Likewise, we respect their right to be represented, within the various working units, by unions or other forms of representation elected in accordance with the legislations and practices in force in the varying countries where they work. Collective bargaining is for us the favored instrument for setting contractual conditions of the people working with us as well as regulating relations between management and unions.

The Group industrial relations activities continue to be carried out according to the model provided for in the Global Framework Agreement (GFA) signed in Rome in 2013 with the Italian industry federations and the global federations IndustriALL and Public Services International, and which is still recognized as a reference best practice for European and non-European multinationals. The agreement is inspired by the best and most advanced systems of transnational industrial relations of multinational groups and institutions of international reference.

For further detail, please refer to “Empowering Enel people”.

## Procurement activities and relationships with business partners

(Human Rights Policy)

Besides guaranteeing the necessary quality standards, our partners are requested to adopt best practices in terms of human rights and working conditions, occupational health and safety, environmental responsibility, and respect for data protection by design and by default.

They are also an integral part in our development and awareness programs: each person must feel that they are responsible for their own health and safety as well as for the others.

In terms of specific actions, we secure that our procurement processes are based on criteria that promote sustainable development and social stability, as well as on the principles of free competition, equal treatment, non-discrimination, transparency and rotation that go on top of complying with local legislation. 100% of the purchasing product categories are preliminarily evaluated in terms of risk, on the basis of human rights, environmental, social and economic criteria.

In addition, we support our partners to increase their resilience also in line with the promotion of practices based on a just and inclusive transition.

For further detail, please refer to “Sustainable supply chain” and “Occupational health and safety”.

## Communities

(Human Rights Policy, “Communities and Society”, principles 2.1.2, 2.2.3 and 2.2.4 “Respecting the rights of communities”, “Respecting the rights of local communities”, “Respecting the rights of indigenous and tribal peoples”)

Our commitment testifies how much we are aware that our activities can have a direct or indirect influence on the communities where we operate and why we believe that responsible community relations constitute a pillar of our strategy. Indeed, individual conditions, economic and social development, and general well-being of collectivity are strictly connected: we therefore commit to conducting our capital expenditure in a sustainable manner and to promoting cultural, social and economic initiatives for the local and national communities involved to advance social inclusion through education, training and access to energy.

We take due regard for the cultural, social, and economic diversities from one country to another and require that each stakeholder deals with us in accordance with them, with a particular attention to conflict affected and high-risk contexts and vulnerable groups like local, indigenous and tribal ones and have committed to respect the International Labor Organization (ILO) Convention no. 169 on the rights of indigenous peoples.

In developing our projects, we commit to engage all the relevant stakeholders, including indigenous and tribal communities as we believe active community engagement throughout the process is essential.

For further detail, please refer to “Engaging communities”.

## Customers

(Human Rights Policy, “Employment practices”, principle 2.1.2 “Respect for diversity and non-discrimination”, “Communities and Society”, principles 2.1.2, 2.2.6 and 2.2.7 “Respecting the rights of communities”, “Privacy”, “Communication”)

We are committed to a just energy transition for everyone also through the offer of innovative and inclusive services for our customers, regardless of their age, for weak, destitute, marginalized, vulnerable people, paying particular attention to people with disabilities.

We undertake to always respond to suggestions and complaints made by customers and consumer associations, making use of appropriate and timely communication systems (e.g., call center services and email addresses), and to consider the needs of all our customers, paying once more particular attention to people with disabilities.

We have also committed to ensuring that our products and services are designed to be accessible for all and do not

compromise the safety and physical integrity of our customers, as far as reasonably foreseeable.

Institutional and commercial communications shall be non-discriminatory and respectful of different cultures, while also not adversely affecting the most vulnerable audiences, such as children and the elderly. This means, amongst other, that contracts and communications addressed to our customers should be clear and simple, drawn up using a language as close as possible to the one normally used by the people for which the message is intended to, be exhaustive, available on our website and accessible in order to be inclusive of vulnerable categories. For further detail, please refer to "Clean electrification".

## Cross-cutting issues

### Privacy

We respect the confidentiality and right to privacy of our stakeholders and we are committed to the correct use of the information and data relating to the people working in our organization, to our customers and to any other stakeholder. Data protection and processing are an important challenge for us in the era of digitalization and market globalization. We process personal data in compliance with the fundamental rights of data subjects and we abide by 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.

We also undertake to monitor all third-party companies that may be in a position to use customers personal data. To this end, there are dedicated clauses in contracts with partners that use personal data to carry out specific activities, such as sales services or customer satisfaction surveys.

### Innovation

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. That is why, in line with the Open Power vision, we also promote an open innovation approach to face the challenges of the energy transition. The open innovation model enables the connection of all the areas of the company with startups, industrial partners, small and medium-sized enterprises ("SMEs"), research centers, universities and entrepreneurs, also through the use of crowdsourcing platforms.

The aim is to foster the adoption of solutions that can enhance our sustainable profile, such as favoring circular economy approaches, which help reducing pressure on the use of resources and on supply chains, ensuring inclusivity, and trying to deal with social issues.

For further detail, please refer to "Innovation".

## Specific salient issues

### Forced labor in the supply chain: the solar sector experience

Since 2013, our commitment against forced or compulsory labor and any form of slavery and human trafficking has been formally set out in principle 2.1.1 Rejection of forced and compulsory labor and of child labor in our Human Rights Policy.

We are committed to contributing to reaching ambitious climate targets, which implies the need to electrify end uses as much as possible while supporting such electrification with a massive deployment of renewable energy production.

Photovoltaics (PV) represents a key technology to enable the energy transition in the European Union (EU) and worldwide, and we believe the EU needs to have strategic PV production inside its borders and to build the related supply chain.

Aware of the challenge ahead of us and of expectations around business contribution to human development also through the UN's 2030 Agenda for Sustainable Development, which go beyond specific legislation, our supplier qualification and contract-awarding processes include rigorous technical, financial, legal, environmental, health and safety, human rights and ethical integrity requirements, applied consistently in all markets.

Moreover, we are pushing for the suppliers to adopt a traceability system to collect information on the supply chain, as well as seeking to visit the companies involved along the supply chain.

Finally, we carry out a number of initiatives to improve transparency across the supply chain both individually and working jointly with other utilities, our suppliers and sector associations (i.e., Global Alliance for Sustainable Energy and Solar Power Europe, to name a few). For further detail, please refer to "Our commitment to a just transition: leaving no one behind".

On top of this, we are working to get to the roots of the issue. Indeed, we are convinced that if we leverage on the momentum for renewables, thanks to the existing R&D and industrial know-how still present in the EU and with support from the EU itself, a new roadmap can be created toward a European industry for solar panels.

That is why we welcomed the public consultation<sup>(4)</sup> launched in January 2022 by the European Commission on the EU solar energy strategy that gathered input on the main bottlenecks and barriers to investment under existing rules in the 'Stakeholder consultation – Synopsis report' published in May. The results of the consultation confirmed that a number of respondents supported the EU manufacturing of solar panels as a way of ensuring that PV products installed in the EU apply high environmental standards, are

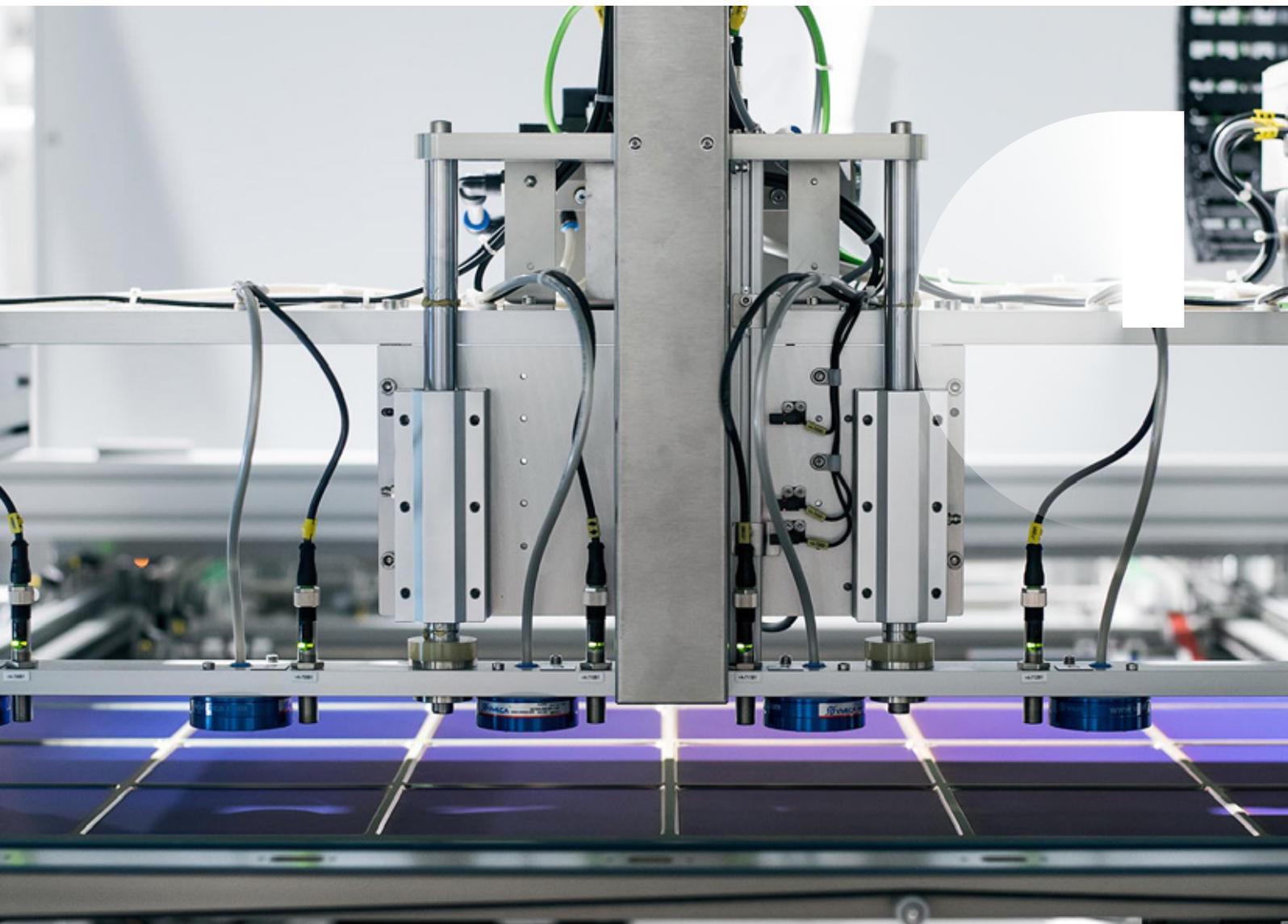
(4) See: <https://ec.europa.eu/info/news/public-consultation-feed-new-eu-strategy-solar-energy-2022-jan-18>.

not produced by forced labor and reinforcing supply chain resilience.<sup>(5)</sup>

In addition, the EU Industrial Strategy published by the European Commission in Spring 2021 identifies solar as one of the key industrial ecosystems. The European supply chain will thus need to be strengthened in order to facil-

itate access to rapidly growing markets within the continent and globally.

For detail on how we are acting to diversify the geographic footprint of the solar supply chain, please refer to “Clean electrification” and “Our commitment to a just transition: leaving no one behind”.



(5) See: [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13338-EU-solar-energy-strategy\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13338-EU-solar-energy-strategy_en).

# Access to remedy

| 2-25 | 2-26 |

We continuously monitor whether stakeholders are affected by our company's business operations, and if any impact is identified, we put in place remedial actions.

We ensure access to remedy through grievance mechanisms to enable people – inside or outside the company – to flag that there is an issue and to seek a meaningful response.

## Grievance mechanism

In line with the third Pillar of United Nations Guiding Principles, we have set up multiple channels of access to remedy, including:

- a **whistleblowing channel**, available to internal and external stakeholders, through:
  - the web or toll-free number shown on the Enel Code of Ethics web page;

- by writing to: Enel SpA - Audit Function - Code of Ethics. Via Dalmazia, 15 - 00198 Rome, Italy.
- several **processes and tools available to the communities** in the influence area of our operations;
- **customers complaints** or information **channels** (via mail, website, toll-free number).

Hereby, a summary description of how they work.

## Whistleblowing channel

Grievances are managed following a specific process codified in the 'Management of anonymous and non-anony-

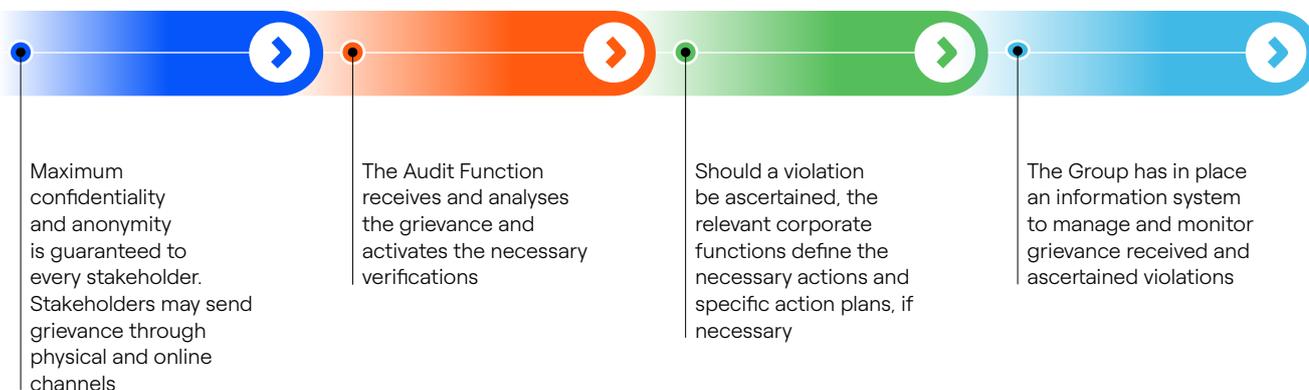
mous reports' policy, illustrated also in our Human Rights Policy, and summarized hereafter:

### Sending a grievance

### Analyzing a grievance

### Acting upon an effective violation

### Management and monitoring



The key elements of the mechanism are:

- anonymity and protection against any form of retaliation;
- protection against groundless allegations made maliciously to harm or cause prejudice to individuals;
- uniformity of treatment at Group level, in compliance with company policies and local regulations.

Identity of stakeholders sending a grievance remains confidential, unless otherwise required by the law.

Whenever, following a grievance, a violation of the princi-

ples contained in the Human Rights Policy is ascertained, the Audit function defines recommendations to implement the corrective actions. The relevant corporate functions thus define the actions to take in accordance with the applicable national legislation provisions.

Furthermore, the Audit Function reports the above violations or any violation recorded during auditing activity as well as the ensuing necessary actions to:

- the Control and Risks Committee, the Chairman of the Board of Directors and the Chief Executive Officer of

Enel SpA, who assess if the Board of Directors should be informed about the most significant cases;

- the corporate bodies of directly or indirectly controlled subsidiaries for the issues of competence.

Access channels are both physical and digital. Moreover, there are also channels at local level and this ensures accessibility to all potentially affected stakeholders in their own language.

For further detail, please refer to the chapter “Values and pillars of corporate ethics”.

## Communities

We provide access channels for reporting by people who need to contact us, using the tools and means available locally, such as local teams or a specific person, toll-free

numbers, or, in the case of isolated rural communities, local leaders who are available to periodically collect any complaints.

## Customers

Customer complaints are managed through dedicated channels and analyzed by a specific working group so that the most suitable actions are taken, both insofar as to the

specific matter of the complaint and, above all, in preventing the underlying causes that have led to the complaint.

## Redressing in legacy projects

3-3 | 413-2 | EU22 | DMA (former EU20)

Hereafter, an illustration of the actual<sup>(6)</sup> impacts relating to a few legacy projects.

### CHILE



1 thermal coal-fired power plant | decommissioned in 2022 | actual impact  
Plant name: Bocamina II | Location: Coronel region of Bío Bío | Size: 350 MW



1 hydro power plants | in operation | actual impact  
Plants names: Ralco | Location: Alto Bío Bío | Overall size: c. 700 MW

### CHILE | BOCAMINA II

#### Actual adverse impact

Land management and relocation.

#### Affected stakeholders

Families living in the area surrounding Bocamina's II unit which was adjacent to the first unit.

#### Background

The plant was part of the coal-fired thermoelectric complex of Bocamina, whose first unit (128 MW) shut down at the beginning of 2021.

The second unit (350 MW), shut down at the end of September 2022, was built in an area characterized by high urbanization and social vulnerability that generated impacts on the housing units around the construction site.

With such closures, after the one involving the Tarapacá plant in 2019, we have become the first power company in the country to stop using coal for its generation operations, 18 years ahead of the original 2040 goal set within Chile's 2019 National Decarbonization Plan and in line with our 2022-2024 Strategic Plan and our 2030 Vision, which place decarbonization and the acceleration of the energy transition at the core.

(6) Impact occurred.

## Remedies identified

### Overview

Engagement with the community has led to the development and the implementation of a broad series of initiatives for the social, economic and entrepreneurial development of the affected community, as well as an ambitious revegetation project to transform the 10-hectare area of the plant's ash landfill, which will no longer be used, into a native forest. In addition, in line with circular economy principles, we are studying various alternatives to reuse the facility's assets in order to provide new life to the site and create development opportunities for the area.

An extensive analysis was carried out in 2017 with the support of a company with considerable experience in this area to review how the original relocation process was carried out with the purpose of remediating any gap vs international existing standards.

Among the gaps that emerged as more evident are the inequality and partiality of the agreements previously reached both with the persons concerned and with local authorities, as well as the misalignment with international standards on resettlement.

The new plan involves approximately 1,400 families, most of them classified as belonging to vulnerable groups by the Ministry of Social Development.

Key actions identified relate to:

- a. preservation of the social and human capital of the communities;
- b. socio-economic development.

### Key lines of work

- a. *Preservation of the social and human capital of the communities:*
  - i. remedy construction defects of some of the new homes which were identified thanks to a joint technical committee involving Enel, the affected community and the Center of Investigation and Technologies of Construction (CITEC) - Universidad del Bío Bío;
  - ii. quantify and compensate the impacts on the quality of life of the families affected by construction defects and the impact associated to 12 churches which were not involved in the resettlement process;
  - iii. finance the reconstruction of the historical school in Coronel, "Rosa Medel" as agreed with the town hall and with the community;
  - iv. requalify new and pre-existing areas adjacent to the plant through the:
    - building 12 community headquarters in various new neighborhoods;
    - painting of a 3,500 square meter mural - one of the largest in Chile - along the external perimeter of the Bocamina power plant, through the narration of the history of Coronel and its inhabitants (involving dozens of neighborhoods and organizations);

- v. Just Transition agreement with Coronel Municipality that will allow local government to invest in strengthening healthcare and education services, along with completing the construction of a new school and park.
- b. *Socio-economic development:*
    - i. support to artisan fishing in the form of dedicated borrowings (defined jointly with the local fishing community);
    - ii. support to local businesses, in the form of dedicated funding.

### Grievance

In line with the United Nations Guiding Principles on business and human rights, both physical and online grievance channels have been made available to the community. In 2022, approximately 1,000 complaints have been received, of which 85% have progressed through to the management phase and have been handled.

For a broader perspective, please refer to the box dedicated to Bocamina included in the chapter "Our commitment to a just transition: leaving no one behind", as well as Enel Chile's Sustainability report and the following webpage: <https://www.enel.cl/en/sustainability/creating-shared-value/bocamina.html>.

## CHILE | RALCO

### Actual adverse impact

Land management and relocation.

### Affected stakeholders

Families living in indigenous land.

### Background

The area of Alto Bío Bío where the plants are located records a historical setting of the indigenous Pehuenche populations whose presence in the area of influence of the plant amounts to c. 3,000 people, equivalent to 800 families spread across 11 communities.

The construction of the Ralco plant led to the flooding of almost 3,500 hectares of indigenous land, and involved the relocation of 81 families (about 400 people) who moved to the territories of the indigenous communities of Ayin Mapu and El Barco, located respectively in the municipalities of Santa Bárbara and Alto Bío Bío.

To support this relocation, we have ensured, for 10 years, social services, housing and a plan of continuity assistance (PAC) to affected families, addressing historical issues and establishing a permanent dialogue with all communities in the area.

### Remedies identified

#### Overview

The engagement with the local community has led to the definition of improvement plans concerning:

- a. education;
- b. economic development to support the self-dependence of local communities;
- c. cultural identity programs;
- d. risk reduction initiatives in emergency situations;
- e. access to energy.

#### Key lines of work

- a. *Education for children and young people living in our area of influence:*
  - i. access and permanence in formal education considering that the average number of years of schooling in the area is 6.5 years, well below the number of years of compulsory education in Chile. This is made possible by assigning scholarships that cover school fees, room and board, study materials. More than 560 students participated in such education aid program during 2022, 56% of which female and 97% from the indigenous Pehuenche community;
  - ii. transport support, access to technology, and scholarships for secondary and higher education;
  - iii. involvement of intercultural Pehuenche assistants in the teaching process;
  - iv. design and construction of the Quepuca Ralco school.
- b. *Economic development to support the self-dependence of local communities:*
  - i. improvement of productive facilities and equipment;
  - ii. skills enhancement through training in agriculture

and tourism, amongst other.

- c. *Cultural identity programs:* measures to support indigenous communities in the development of cultural initiatives aiming at promoting, consolidating and supporting cultural practice, like traditional ceremonies, language conservation, dissemination of culture and other.
- d. *Risk reduction initiatives in emergency situations:* agreement with the Municipality of Alto Bío Bío to tackle the multidimensional poverty of local population's dwellings and reduce risks in emergency situations through skills enhancement and training of vulnerable groups to support their response in the occasion of emergencies linked to volcanos eruption and forest fires.
- e. *Access to energy:* Collaboration with the Municipality to maintain 120 photovoltaic panels that belong to families residing in the Alto Bío Bío area so that they can access a clean and sustainable electricity supply.

#### Grievance

In line with the United Nations Guiding Principles on business and human rights, both physical and online grievance channels have been made available to the community. In 2022, 24 complaints have been received, of which 79% have been connected to human rights. All of them have progressed through to the management phase and have been handled.

## COLOMBIA



1 hydro power plant | in operation | actual impact  
Plant name: El Quimbo | Location: department of Huila | Size: 400 MW

## COLOMBIA | EL QUIMBO

### Actual adverse impact

Land management and relocation.

### Affected stakeholders

Families resident and people working or having commercial and service activities in the area of influence of the plant.

### Background

The plant is located in the Department of Huila and its building contributed to the increase in the energy security and the stability of the Colombian electricity system, as well as promoting the growth of the area of influence in line with the Department of Huila development plans.

## Remedies identified

### Overview

Engagement with the community started in late 2014 and has led to the development and the implementation of a multi-year plan including a broad series of initiatives, mainly related to:

- a. environmental management training;
- b. socio-economic development.

### Key lines of work

#### a. Environmental management:

- i. environmental awareness-raising activities;
- ii. protection of biodiversity and nature:
  - large scale ecological restoration of >11k hectares of tropical dry forest (for further detail, please refer to "Conservation of natural capital").

#### b. Socio-economic development:

Activities focused on providing support on technical issues related to production processes and how to improve their efficiency.

During the last 10 years, more than 30 projects were carried out in the municipalities of Altamira, Tesalia, Paicol, Garzón, Gigante and El Agrado for an investment of higher than 2 million euros that was beneficial to more than 15,000 families in the department of Huila.

The most significant cooperation agreements relate to the implementation of concerted agricultural production plans with nearly 90 resettled families in Garzón, Altamira, El Agrado and Gigante. With an investment of more than 800,000 euros, the beneficiaries improved and increased the production and marketing of different foods such as corn, wheat, lemon, milk, cocoa, tomato, and a wide variety of fruits, also including produce for self-consumption. Hereby, a few examples of the main agreements signed in 2022.

### Garzón Municipality

#### Planting of 100 hectares of coffee jointly with plantains

The project aims at getting coffee varieties resistant to rust and with higher yields and will benefit 100 coffee growers who will receive coffee seedlings, fertilizers and agricultural equipment. In addition, technical, social and environmental monitoring will be carried out to guarantee the sustainability of their crops and increase coffee production.

Enel will cover approximately 40% of the total investment (equal to more than 250,000 euros).

#### Optimization of the local marketplace meat module electrical appliances

The project aims at revamping electrical networks built more than 20 years ago and will benefit more than 70 merchants. Enel will contribute c. 80% of the total investment (equal to more than 110,000 euros).

### Tesalia Municipality

#### Installation of sugarcane molasses processing plant

This initiative will benefit small and medium-sized sugarcane growers, with the construction of a sugarcane molasses processing plant and the planting of 15 hectares of new sugarcane, with the aim of increasing panela manufacturing and improving the living conditions of families.

Enel will cover more than 80% of the total investment (equal to close to 65,000 euros).

#### Livestock infrastructure improvement

This project is aimed at improving livestock infrastructure, sanitary conditions for bovines and increased milk production, with the supply of silage or concentrated feed, generating profitable and sustainable livestock, and thus improving the socio-economic condition of the benefited farms belonging to the ASOGATE, ASOGAPAC and FOGAGRO associations.

Enel will cover more than 80% of the total investment equal to close to 90,000 euros, with the Tesalia municipality and the associations covering the remainder.

#### Strengthening of the productive system of cocoa families

The initiative relates to the delivery of machinery and specialized fertilizers, with the objective of increasing cocoa production by 75%.

Enel will cover 80% of the total investment of over 80,000 euros.

#### Strengthening the production and marketing of cherry tomatoes

The project was achieved in 2022 and involved more than 90 producers from the department of Huila, allowing the cultivation of around 5,500 seedlings of this product and the generation of close to 3,400 euros of income.

The initiative was run in cooperation with three associations Agroprosur, Asocapa and AsosanJosé and Enel has contributed 51% of the total investment (equal to over 80,000 euros) while the remainder was covered by the Municipality of Tesalia, the Agroprosur, Asocapa, AsosanJose associations, and the hydrocarbon company Hocol (represented by the Fundación del Alto Magdalena).

Three greenhouses were built together with two seedbeds where sowing, vegetative phase and subsequent transplantation of the fruits are currently carried out. In addition, the beneficiaries were trained in permaculture and agroecology, good agricultural practices (run by the National Learning Service - Sena) and attended workshops on harvest management, and marketing.

### Paicol-Huila Municipality

#### Bovine genetic improvement

This project, that will benefit 94 farmers, seeks to contribute to the livestock development of the region, enhancing milk production rates together with the improvement of the genetic quality of the cattle.

Total investment is equal to close to 140,000 euros, 30% of which will be covered by Enel.

#### Cocoa Effect

This is a long-standing project which involves the United States Agency for International Development (USAID), the Luker Foundation, Luker Chocolate, the Saldarriaga Concha Foundation and Eafit University and is aimed at strengthening cocoa production through training of cocoa producers, environmental assessments instrumental to cocoa production, support to cocoa trees cultivation (through all stages of development), assistance to fight pests and diseases.

At the end of 2022, we have started activities to extend the program to a larger number of cocoa farmers.

### Grievance

In line with the United Nations Guiding Principles on business and human rights, both physical and online grievance channels have been made available to the community. In 2022, 604 complaints have been received, of which 100 were just requests of information. The remainder have progressed through to the management phase and have been handled.

### Other relevant information

Some local inhabitants/fishermen have started "acciones de grupo" and "acciones populares", currently pending, declaring that the revenues from their activities have been reduced due to the construction of the power plant and that the activities of filling the El Quimbo dam allegedly impacted downstream fishing and its environment. For further detail, please refer to the paragraph on El Quimbo, in the "Contingent assets and liabilities" section of the 2022 Consolidated Financial Statements. Further initiatives and information are also available in the 2022 Enel Américas Sustainability Report.



## Other projects under development

### WINDPESHI (La Guajira)



1 wind power plant | under development  
Plant name: Windpeshi, | Location: La Guajira | 200 MW

#### Background

The plant will contribute to the country's energy mix diversification.

#### Stakeholders in the area of influence

Indigenous communities resident in the municipalities of Maicao and Uribia, belonging to the department of La Guajira a region characterized by a significant presence of indigenous communities, which represent 20% of the overall population in Colombia.

#### Outcome of the stakeholder engagement process

##### Overview

La Guajira is a region with very high rates of unsatisfied basic needs. Key actions identified relate to socio-economic development

##### Key lines of work

- a. *Socio-economic development:*
  - i. access to drinking water:
    - two public basins have been built to provide drinking water to the communities in the area of influence;
    - an aqueduct that was not working was rehabilitated, providing water to the communities on the road to

Windpeshi.

Both actions have benefited 3,000 people belonging to the Wayuu indigenous population;

- ii. education:
  - agreement signed with SENA, Servicio Nacional de Aprendizaje which provides technical training and certifies the level of ability achieved by the affected communities. Actions concerned job training on basic construction works and support to entrepreneurship development through marketing, sales and handicraft courses aimed at empowering communities to develop their own business;
  - joint project with Artesianas de Colombia in the Wayuu territory concerning their artisanal weaving crafts. The training activities benefited 560 people overall, 270 through the agreement with SENA and 290 in the joint project with Artesanías de Colombia.

#### Other

We also reached an agreement with the University of La Guajira for the creation of an intercultural manual, which represents a fundamental tool for understanding the dynamics and particular aspects of the ethnic communities.

### Midelt, Boujdour & Essaouira



3 wind power plants | 1 in operation and 2 under development  
Sizes: 210 MW, 300 MW and 270 MW

#### Background

In March 2016, a consortium between Enel Green Power and the Moroccan company Nareva, in partnership with the supplier Siemens Renewable Energy, was awarded the project for the development, construction, and management of wind plants.

The energy produced by the wind farm will be sold to ONEE that will use this energy for the benefit of all final users, including the local population.

#### Status up-to-date

In operation: Midelt, a 210 MW wind plant located about 20 Km from the Midelt city center.

Under construction: Boujdour, a 300 MW wind plant located approximately 180 km south of Laayoune Port (Marsa

port) and Essaouira, a 270 MW wind plant located about 28 km from Essaouira city.

#### Stakeholder engagement

##### Midelt

- 2015: preliminary analysis of the social, economic, and environmental context ("SEECA") to identify relevant socio-economic issues and specific needs of local communities;  
2019: environmental and social impact assessment (Environmental Social Impact Assessment - ESIA);  
2020: new SEECA and consultation.

##### Key actions implemented

- a. *Environment (sustainable building site and during operations):*

- i. assessment and mitigation of environmental impacts, including CO<sub>2</sub> emissions, waste, and water, by means of:
  - photovoltaic mini-grid plus storage used to power basecamp, auxiliary services of the base camp and turbines erection;
  - stand-alone PV modules used to power prefabricated buildings/containers and streetlights;
  - utilization of energy efficient technology (LED lamps, solar water heating system) to reduce electricity consumption;
  - water recycling solution installed in all water systems;
  - implementation of a biodiversity preservation plan aimed at protecting the local ecosystem, among which plantation of local trees and species nearby the building area.
- b. *Occupational health and safety:*
  - i. application of highest standards, in line with Enel's customary practices.
- c. *Socio-economic development during construction and operation & maintenance:*
  - i. training and hiring of more than 250 people for non-qualified works, all belonging to the Midelt community;
  - ii. maximized hiring of local small and medium-sized businesses for auxiliary services (including transportation, cleaning, catering, supply of materials, etc). This was aimed also at supporting the local economy particularly affected by the consequences of the pandemic;
  - iii. food basket provision to the most vulnerable local families.
- d. *Promotion of education, including during the operations & maintenance phase:*
  - i. classes dedicated to approximately 1,400 beneficiaries of 6 local schools in Amersid & Mibladen rural communes, held by local volunteers that covered topics related to renewables and the operation of wind plants;
  - ii. setting up of a yearly scholarship granted to one university student coming from the community of Midelt;
  - iii. implementation of a sustainability and environmental education program called AKABAR AL MAARIFA to train trainers at schools in Midelt and educate kids at primary schools with the aim to:
    - develop ecological and social awareness, environmental sensitivity, behaviors and skills;
    - promote an active participation in community issues from early childhood so to build an environmental citizenship since primary schools;
    - introduce, in addition, an effective training and professional development program to equip teachers

with the knowledge, values, skills and strategies necessary to implement the above environmental citizenship.

e. *Healthcare during the operations phase:*

- i. setting up of a medical facility (caravan) made available to 1,400 students coming from surrounding schools for specialist examinations of various types (general practitioners, dentists, ear, nose, and throat doctors, etc. plus provision of eyeglasses when needed) as a mean to fight children school dropout caused by health issues.

**Boujdour**

- 2015: preliminary analysis of the social, economic, and environmental context ("SEECA") to identify relevant socio-economic issues and specific needs of local communities, including infrastructure development, education, healthcare, poverty issues, social services, and protection of cultural heritage;
- 2019: environmental and social impact assessment (Environmental Social Impact Assessment - ESIA);
- 2020: human rights due diligence<sup>(7)</sup> and a new SEECA and consultation involving vulnerable people groups who self-identified as Saharawi.

**Key actions implemented**

- a. *Environment (sustainable building site and during operations):*

Please refer to Midelt description.
- b. *Labor, with regards to occupational health and safety:*
  - i. application of highest standards, in line with Enel's customary practices.
- c. *Socio-economic development (during construction and operation):*
  - i. training and hiring of Saharawi people:
    - setting up of a training centre in the base camp with training in civil and electrical capabilities aimed at filling the local gap of expertise thus creating the opportunity of using such skills also in the future;
    - hiring of c. 200 people for non-qualified works, of which >90% from the local Saharawi community;
    - hiring of technical staff for O&M management, turbine service provider and substation maintenance, security services and housekeeping;
  - ii. maximized hiring of more than 100 local small and medium-sized businesses for auxiliary services (including transportation, cleaning, catering, supply of materials, etc.). This was also aimed at supporting the local economy particularly affected by the consequences of the pandemic;
  - iii. *ad hoc* infrastructures for the needs of people and

(7) In line with UN Guiding Principles on Business and Human Rights and in collaboration with an independent no profit organization with an international expertise in business and human rights.

of the local small businesses in the area of influence of the project:

- during civil works, new sections of road were built as well as requalifying existing ones (c. 60km). This activity allowed to reconnect main roads with grazing areas, thereby benefiting the pastoral communities in remote areas;
  - due to the newly available renewable electric energy generated by the Boujdour plant, the local electricity connection to the city of Boujdour is being reinforced;
  - iv. support to local Saharawi camel nomads through the provision of water tanks and cisterns;
  - v. food basket provision to the most vulnerable local families.
- d. *Promotion of education:*
- i. Education and vocational training programs designed to fight against primary school dropout, filling the mismatch between training and employment opportunities, providing knowledge about renewable energy. The initiatives involved approximately 1,000 beneficiaries of 11 local schools, and related specifically to:
    - entrepreneurship masterclass: Workshop with INJAZ ALMAGHRIB to get young people from the college acquainted with business activities;
    - 'It's My Business': with INJAZ ALMAGHRIB aimed at fostering entrepreneurship skills of middle school students through gamified activities and multiple examples of nationally and internationally well-known entrepreneurs;
    - company program: with INJAZ ALMAGHRIB addressing all stages of business creation and making young high school students able to participate to different competitions, at local, national and regional level (MENA);
    - classes held by local volunteers of Nareva and Enel Green Power Morocco covering topics related to renewables and the operation of wind plants;
    - setting up of a yearly scholarship granted to one university student coming from the community of Boujdour.
- e. *Healthcare:*
- i. setting up of a medical facility (caravan) made available to 1,000 students coming from surrounding schools for specialist examinations of various types (general practitioners, dentists, ear, nose, and throat doctors, etc. plus provision of eyeglasses when needed) as a mean to fight children school dropout caused by health issues.

#### Essaouira

- 2015: preliminary analysis of the social, economic, and environmental context ("SEECA") to identify relevant socio-economic issues and specific needs of local communities, including infrastructure development, education, healthcare, poverty issues, social services, and pro-

tection of cultural heritage;

- 2021: environmental and social impact assessment (ESIA).

#### Key actions implemented

- a. *Environment:*  
Please refer to Midelt and Boujdour description.
- b. *Occupational health and safety:*
  - i. application of highest standards, in line with Enel's customary practices.
- c. *Socio-economic development during construction:*
  - i. training and hiring of people employed for civil and electrical works;
  - ii. hiring of 210 people belonging to the local community for non-qualified works;
  - iii. maximized hiring of local small and medium-sized businesses for auxiliary services (including transportation, cleaning, catering, supply of materials, etc.).
- d. *Promotion of education and other services:*
  - i. training dedicated to approximately 400 beneficiaries of local schools, held by local volunteers that covered topics related to renewables and the safety measures for the construction of wind plants;
  - ii. installation of safety fences for local schools near the roads;
  - iii. rehabilitation of a local religious saint visitors' place to the benefit of the local community.

#### Grievance

Management system for all three plants in line with the United Nations Guiding Principles on business and human rights.

- Set up: once received, complaints are registered, analyzed and classified from 1 to 3 (score range takes into account repetition, severity; 1 is the lowest, 3 the highest).
- The analysis leads to the identification of the possible solution. Once the solution is agreed, the complaint is considered as solved.
- Tools available to the community: complaints may be received through on-site suggestion boxes, traditional mail, email, by phone, company representatives during their staff visits.

The language used is "Arabic" and when a member of the community is not able to write and talks a dialect, a translator is identified within or out the building site.

**Midelt** | Complaints managed concerned:

1. Request on using local labor from the community.  
Solution agreed: hired non-qualified workers as described at point c., i. of the Midelt key actions implemented.
2. Request for using local SME's.  
Solution agreed: contractors, with the support of local stakeholders, launched a beauty contest to select local service providers from the city of Midelt as suppliers for the services and equipment needed as described at point c., ii. of the Midelt key actions implemented.

**Boujdour** | complaints managed concerned:

1. Request for using local labor from the Saharawi community.  
Solution agreed: hired non-qualified workers as described at point c., i. of the Boujdour key actions implemented.
2. Request for using local SME's.  
Solution agreed: contractors, with the support of local stakeholders, launched a beauty contest to select local service providers from the city of Boujdour as suppliers for the services and equipment needed as described at point c., ii. of the Boujdour key actions implemented.

**Essaouira** | Complaints managed concerned:

1. Request for using local labor from the community.  
Solution agreed: hired non-qualified workers as described

at point c., ii. of the Essaouira key actions implemented.

2. Request for using local SME's.  
Solution agreed: contractors, with the support of local stakeholders, launched a beauty contest to select local service providers from the city of Essaouira as suppliers for the services and equipment needed as described at point c., iii. of the Essaouira key actions implemented.
3. Request of repairing water pipes that were damaged.  
Solution agreed: the water pipe was repaired to ensure water supply continuity while starting the building of a brand new one.
4. Request to reduce the lifting of dust by trucks.  
Solution agreed: contractors started irrigating roads using recycled water or pumped from the sea so as to reduce lifting of dust during transportation.

## VALUE4DISABILITY

**With the Enel Value4Disability project people with disabilities lead the way: not only inclusion but empowerment**

**O**ur commitment to inclusion, as defined in our Human Rights Policy, relies on considering proactively the needs and priorities of individuals and society at large.

In addition to ensuring that no one is left behind, this approach encourages the generation of new ideas and is an essential condition for creating sustainable value in the long term.

Since 2019, we are part of **Valuable 500**, a global organization involving 500 CEOs and their companies, whose mission is to drive lasting change for more than 1 billion people around the world who live with a disability.

In 2020, therefore, we launched the **Enel Value4Disability** global project, which aims to empower Enel people and customers with disabilities, enable the environment of startups dealing with assistive technologies and make digitally accessible both the main web portals used by Enel people/customers and the software application development, testing and release processes.

In 2022 we achieved important results, also thanks to the dissemination of the project both on internal communication channels (magazine and corporate intranet) and through external communication initiatives (National Geographic, Financial Times, influencers and interviews and articles on the topic of inclusive business on specialized sites).

We also joined **Business for Inclusive Growth (B4IG)**, a global coalition of CEOs from global companies fighting inequalities. Through its strategic partnership with the OECD, B4IG interacts with governments around the world to promote inclusive growth.



## For Enel people

Globally, there are 2,129 people with disabilities, of which over 70% in Italy.

We make sure to listen to their needs thanks to “focal points” present in all countries where at least one colleague with a disability is present.

This allows us to develop dedicated initiatives both locally and globally, in line with our Human Rights and Diversity and Inclusion Policies. In particular, these initiatives allow to carry out work in complete autonomy, through tools, services and methodologies that can create an inclusive working and relational environment for all, and to raise awareness and train all people, with particular focus on specific roles more affected by these issues (new hires, managers, people & business partners, customer contact points).

Empowering initiatives include:

- Global Inclusive Travel services to ensure an inclusive experience of stay and travel for business trips of colleagues with disabilities (for example, information on accessibility services in hotel facilities, activation of travel assistance service, travel accompanying services). 47% of colleagues can use at least one of the Inclusive Travel services;
- participation in the Generation Valuable project promoted by the Valuable 500 network with the aim of spreading the culture of inclusion and empowerment of people with disabilities through mentoring meetings between talented colleagues with managers;
- drawing of global guidelines to ensure adoption of accessibility principles for the development of e-learning content;
- assistance and support for the adoption of assisting tools by a dedicated team in Italy;
- “Ability line” service in Romania to support colleagues in recognizing disability;

## For our customers

One of the most innovative aspects of the Value4Disability project is **inclusive business**, namely the Group’s commitment to opening new opportunities in terms of social innovation and business development starting from the solution of social needs. To promote this new approach in an integrated way, it is necessary to have a single vision of customer needs in terms of inclusiveness and accessibility.

In 2022 we have:

### a. defined who vulnerable customers are and what are their needs.

“Vulnerable customers, for Enel, are both individuals and entities who when looking at the combined effect of their intrinsic features, socio-demographic elements, economic and environmental conditions:

- cannot participate or risk being adversely impacted

- initiatives to ensure physical and relational accessibility in Spain and Chile and to promote digital accessibility in Colombia;
- hiring and internships of people with disabilities in Italy, Spain and Brazil, integration initiatives in collaboration with local institutions in Chile, Argentina and Mexico, inclusive staff research in collaboration with research and selection platforms in Romania, Argentina, Peru and Colombia;
- pilot project, in Brazil, of tutoring in a process of onboarding, listening and development in which more than 140 people with disabilities are participating and which involves about 100 managers and about 30 people and business partners.

Awareness and training initiatives include:

- design of an initiative at global level to spread awareness about the Design for all principles application to business processes and contexts so as to foster an inclusive mindset in Enel’s people;
- the videos “Our ability”, to learn everyday stories of colleagues with disabilities in their working environment, and the webinar “Neurodiversity and autism” on the value of neurodivergent thinking in Italy;
- the online course “Hablamos de Discapacidad” and the web fiction “La casa de la inclusión” in Spain, subsequently customized for Romania, where podcasts on the inclusion of diversity and disability have also been developed, and the “D&I hour” when onboarding new hires;
- workshops and thematic podcasts in Chile and Colombia, where all colleagues were also offered an induction on sign language.

For further detail, please refer to “Empowering Enel people”

by the energy market or by any of Enel Group’s operations;

- have difficulties in obtaining or using information to represent their interests;
- are less comfortable accessing and using appropriate services and products.

Customers who are not directly vulnerable may fall under this definition if vulnerable people live in the same family and depend on family support or other assistance.”

By focusing on temporary or permanent **conditions**, vulnerability results from the interaction between personal characteristics and changing environmental and socio-economic conditions.

Moreover, the application of this definition is not limited to individuals, but is extended to all entities that

may be in a vulnerable position (for example, family small enterprises in which the owner dies, associations or businesses affected by economic situations such as earthquakes, floods, wars, financial crises). Therefore, social<sup>(8)</sup> and economic vulnerability, disability, dependence on medical equipment, and other diversity aspects such as seniority, language, literacy, and any other feature that causes a certain degree of exclusion fall within the vulnerability definition;

**b. developed ad hoc initiatives to promote customer inclusion**, thanks to intensive benchmarking and the support of business leaders and the contribution of internal communities of colleagues with disabilities. Here are some examples:

- **training course on vulnerable customers**, dedicated to those who relate directly with customers;
- **guidelines for accessible and welcoming stores**;
- **inclusive electrification process**: we have launched a pilot project in Colombia to ensure that the electrification and contract signing phases are sustainable

## For our communities

As part of the sustainability projects planned in the area of influence of “Coral” in India, where we developed a wind farm of about 170 MW and, following the usual process of listening to local stakeholders, a grazing animal (a buffalo) for the production of milk was given to a member of the community in Gujarat, born with lower limb disability. By investing the earnings of milk sales in awareness raising and empowerment activities of people with disabilities in other villages, such person has become a natural leader, developing a network of about 450 individuals. In practice, such member of the community supports the network of wom-

en and men with disabilities in modifying their condition of marginality, which is considered non-productive, in a condition that supports the whole family.

- **Enel Premia Wow! for All**: project carried out as part of Enel Energia’s loyalty program for the free market, aimed at the periodic inclusion in Enel Premia Wow! of discount coupons related to the theme of inclusion;

**c. involve our Business Lines in developing inclusive business initiatives.**

Enel X Way has, for example, made available in open source mode the redesign of spaces for charging electric vehicles to make them ‘accessible’ to anyone, from public administrations to other companies in the e-mobility sector. In addition, Enel X Way WayAbility<sup>TM</sup> has been modified and updated: it is a product that makes it possible to recharge electric wheelchairs thanks to the public charging infrastructure in urban areas.

Moreover, vulnerable conditions are a source of stimulus and continuous social innovation. An example of these innovations is the sign language interpreting, subtitling and translation service, developed together with 2 startups (VEASYT and Padius) that will be tested within the Group in 2023.

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(8) For example: gap in the use of technology, acting as caregivers, economic situations such as earthquakes, floods, wars, financial crises etc.

Concept design and realization

**Gpt Group**

Copy editing

**postScriptum** di **Paola Urbani**

Publication not for sale

Edited by

Enel Communications

Disclaimer

This Report issued in Italian has been translated into English solely for the convenience of international readers

Enel

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Registered Office 00198 Rome - Italy

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Stock Capital Euro 10,166,679,946 fully paid-in

Companies Register of Rome and Tax I.D. 00811720580

R.E.A. of Rome 756032 VAT Code 15844561009

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