

# HUMAN RIGHTS POLICY



All Enel *stakeholders* can report any violations or suspicions of violations of the Human Rights Policy using the following methods:

- in writing, specifically via the web, through the online reporting system available at the following [link](#);
- by contacting the numbers available on the aforementioned webpage;
- or, at the request of the reporter, through a direct meeting scheduled within a reasonable timeframe, using the aforementioned channels.

## ENEL'S COMMITMENT TO RESPECTING HUMAN RIGHTS

Enel aims to create sustainable and shared value with all its *stakeholders*, both internal and external, by innovating and pursuing excellence while leveraging respect for diversity throughout the entire value chain of the businesses in which it operates.

Enel is leading the energy transition by facilitating access to cleaner and more efficient solutions, consistently supporting individuals in managing their energy consumption responsibly and actively contributing to a more sustainable lifestyle. Moreover, it demonstrates respect and commitment to future generations by protecting the environment and building a sustainable and better future for all, with a long-term vision.

Our journey began by fostering access to energy for an ever-increasing number of people: we then embraced new technologies, new services, new ways to use energy, and new partnership models, engaging all our *stakeholders* as much as possible to collaboratively create a more sustainable future. The sustainable strategy and an integrated business model enable us to contribute to achieving the United Nations Sustainable Development Goals and to balance risks.

A fair and inclusive transition is one that does not leave anyone behind and considers the needs of all *stakeholders*, with particular attention to the most vulnerable.

To this end, we commit to:

- proactively consider the needs and priorities of individuals and society, as this allows for innovation in processes and products – an essential aspect of an increasingly competitive, inclusive, and sustainable business model. This also includes the adoption of principles of circularity, the protection of natural capital, and the preservation of biodiversity;
- promote the engagement of key *stakeholders* both externally and internally to enhance their awareness and foster a constructive dialog that can provide valuable contributions to the development of solutions for mitigating climate change.

We believe that companies have the opportunity to create positive impacts on society; therefore, respect for human rights should be considered the foundational element in pursuing sustainable progress that goes beyond mere compliance with existing regulations.

To this end, we are also committed to acquiring, developing, and utilizing Artificial Intelligence systems in a manner that adheres to the principles of respect for human rights, harm prevention, equity, and transparency. We pay particular attention to issues of inclusion and diversity, as well as the protection of all *stakeholders*, especially those who may belong to vulnerable groups such as minors, individuals with disabilities, or other groups historically subjected to discrimination or at risk of exclusion.

With this Policy, we express our commitment to respect all Human Rights, particularly those that are closely relevant to our value chain, in accordance with the findings from our *stakeholder* consultation (internal teams, society, suppliers, human rights experts, “think tanks”, NGOs) conducted based on the criteria outlined in the guide “UN Global Compact Guide for business: how to develop a Human Rights Policy.”

We are committed to overseeing the implementation of this Policy: (i) implementing a specific “*Due Diligence*”<sup>1</sup> process; (ii) promoting behaviors aligned with a just and inclusive transition, and (iii) communicating regarding the action plans developed to prevent and address any issues that may arise.

This Policy establishes the commitments and responsibilities that all our collaborators (Enel S.p.A. and its subsidiaries<sup>2</sup>) undertake in relation to Human Rights, particularly regarding the conduct of business and corporate activities, as well as the standards we require our *stakeholders* to adhere to.

## 1.1 International Reference Framework

This Policy adheres to the following fundamental values of International and European Law and applies its foundational principles:

1. International Bill of Human Rights of the United Nations (UN);
  - a. Universal Declaration of Human Rights;
  - b. International Covenant on Civil and Political Rights;
  - c. International Covenant on Economic, Social and Cultural Rights;

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<sup>1</sup> In the context of the Guiding Principles on Business and Human Rights (Principles 17-21), this term refers to a continuous management system that a company implements taking into consideration the industry in which it operates, the operating contexts, the size of the company and beyond, to ensure that it respects or is not complicit in human rights abuses. This entails “identifying, preventing, mitigating, and reporting” potential negative effects that may arise from the company’s activities.

<sup>2</sup> Hereinafter Enel S.p.A. and all companies directly or indirectly controlled by it will be referred to as “Enel”.

2. The fundamental conventions of the International Labor Organization (ILO) – Nos. 29, 87, 98, 100, 105, 111, 138, 182 – and the Declaration on Fundamental Principles and Rights at Work;
3. The United Nations Convention on the Rights of the Child;
4. The ILO Conventions No. 107 and No. 169 on the Rights of Indigenous and Tribal Peoples;
5. The European Convention on Human Rights.

In addition, the following private sector standards and voluntary initiatives were taken into account in their most up-to-date editions:

1. The 10 Principles of the UN Global Compact;
2. The Guidelines of the Organization for Economic Co-operation and Development (OECD) for Multinational Enterprises;
3. The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the ILO;
4. The Guiding Principles on Business and Human Rights: implementing the UN framework “protect, respect, and remedy”;
5. United Nations Declaration on the Rights of Indigenous Peoples;
6. *ILO Guidelines for a Just Transition towards Environmentally Sustainable Economies and Societies for All*;
7. Modern Slavery Act of the United Kingdom, 2015;
8. Performance Standards on Environmental and Social Sustainability.

## 1.2 Internal Reference Framework

The following internal documents are linked to the principles outlined in this Policy and support its implementation:

1. Code of Ethics
2. Zero Tolerance for Corruption
3. Enel “Global Compliance Program”
4. Organizational and Management Model pursuant to Legislative Decree No. 231 of June 8, 2001 (“Model 231”) and Other Models for Preventing Legal Risks on a Global Scale
5. Global Framework Agreement with Global Trade Union Federations
6. Application of the “General Data Protection Regulation” (EU regulation 2016/679) dated May 25, 2018
7. Health Policy

8. Policy on Diversity, Equity, Inclusion, and Belonging
9. Global Policy Against Harassment
10. Enel Group's Statement on Harassment
11. Digital Accessibility Policy
12. Environmental Policy
13. Biodiversity Policy
14. Environmental and Social Impact Assessment and Management Policy (ESIA)
15. Whistleblowing Policy

## PRINCIPLES

The principles included in this section take into account their relevance to our business activities and relationships, as well as the outcome of the consultation process with the aforementioned *stakeholders*.

We are committed to upholding these principles in every country we operate in, while considering local cultural, social, and economic differences. We require that each of our *stakeholders* adopts behavior which reflects these principles, with particular attention to high-risk contexts or areas affected by conflict.

The term stakeholder refers to all individuals or entities with a direct or indirect interest in the Group's activities, including but not limited to customers, employees of all levels, suppliers, contractors, partners, other businesses, and associations, the financial community, civil society, local communities, indigenous and tribal populations, national and international institutions, the media, as well as the organizations and institutions that represent them.

Specifically, in addition to ensuring necessary quality standards, supplier performance must align with a commitment to adopting best practices regarding human rights and labor conditions (including appropriate working hours, prohibition of forced or child labor, respect for personal dignity, non-discrimination and inclusion of diversity, freedom of association, and collective bargaining), occupational health and safety, environmental responsibility, and adherence to *privacy by design and by default*.

With our commitment, we aim for sustainable progress to make our Company and the communities in which we operate richer, more inclusive, and resilient, leaving no one behind.

## 2.1 Employment Practices

### 2.1.1

#### Rejection of Forced or Compulsory Labor and Child Labor

We reject the use of any form of forced or compulsory labor<sup>3</sup> and any form of slavery or human trafficking, as defined by ILO Convention No. 29. We do not confiscate either money or identity documents to retain workers against their will. We believe that children and minor workers represent a vulnerable category, which is why we pay exceptional attention to respecting their rights throughout the value chain of our operations.

We reject the use of child labor. We reject the use of child labor. Workers' minimum age is defined by the existing legislation in the country where the activities are conducted, and in any case should not be lower than the minimum age established by ILO Convention n. 138.

### 2.1.2

#### Respect for diversity and non-discrimination<sup>4</sup>

We promote the principles of diversity, inclusion, equal treatment, and opportunity, and we are committed to guaranteeing the right to working conditions that are respectful of dignity of every individual, as well as creating a workplace where people are treated fairly and valued for their uniqueness.

We are committed to safeguarding the physical and psychological integrity and individuality of each person, and we oppose any form of behavior that causes discrimination based on gender, age, disability, nationality, affective orientation and gender identity, ethnicity, religion, political beliefs, or any other form of individual diversity, or that is harmful to a person, their beliefs, or preferences. Similarly, we promote freedom of expression.

We do not tolerate physical, verbal, visual, psychological, discriminatory, or sexual harassment that creates a degrading, hostile, humiliating, intimidating, offensive, or unsafe work environment.

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<sup>3</sup> Forced or compulsory labor refers to any work or service extracted from a person under the threat of punishment or for which that person has not volunteered willingly (See art. 2 par. 1, ILO Convention No. 29).

<sup>4</sup> The term discrimination encompasses both direct and indirect discrimination, specifically: a) any distinction, exclusion, or preference based on race, color, sex, sexual orientation, religion, political opinion, national descent, or social origin, that has the effect of denying or altering equality of opportunity or treatment in employment or profession; b) any other distinction, exclusion, or preference that results in denying or altering equality of opportunity or treatment in employment or profession. (See Article 1 Paragraph 1, ILO Convention No. 111).

We are committed to an energy transition that is “fair for all,” including the provision of innovative services that are inclusive of all unique needs. We pay particular attention to customers in vulnerable and fragile situations, such as certain demographics based on age, those in financial hardship, marginalized individuals, and people with disabilities.

We are committed to always responding to suggestions and complaints from our customers and the associations that represent them, utilizing appropriate and timely communication systems (such as call center services and email addresses), and to considering all customer needs, with special attention to individuals with disabilities.

### 2.1.3

#### Freedom of Association and Collective Bargaining

We protect the right of our employees to establish or participate in organizations aimed at defending and promoting their interests. Similarly, we also respect their right to be represented, within the various production units, by unions or other forms of representation, elected in accordance with the laws and practices in place in the different countries where they work.

We believe that collective bargaining is the favored instrument for establishing the contractual conditions of our employees, as well as for regulating the relationships between management and unions.

### 2.1.4

#### Health, Safety, and Well-Being

At Enel, we consider the health, safety, and psychological, relational, and physical well-being of individuals to be the most valuable asset, deserving protection at all times — whether at work, at home, or during leisure time.

For this reason, we are committed to developing and promoting a robust culture of health, safety, and well-being, ensuring increasingly healthy and safe processes and workspaces for both our employees and anyone collaborating with Enel, as well as fostering behaviors oriented towards “*work-life harmony*”. We are actively committed to promoting personal and organizational well-being, which are enabling factors for engagement and the innovative potential of individuals.

We promote communication at all levels of the organization to disseminate the strategic principles that guide our daily actions and to strengthen individual awareness and the adoption of responsible behaviors by everyone.

We promote the consultation and participation of employees and their representatives as a fundamental lever to maximize the protection of Health and Safety.

Our commitment is also reflected in integrating health and safety at all levels of the organization and throughout all processes, in training activities, in the strict selection and management of suppliers and contractors, in information sharing, and in the ongoing *benchmarking* with external entities.

We also engage our contracting firms and suppliers in development and awareness programs: every individual must feel responsible for their own health and safety, as well as that of others.

### 2.1.5

#### Just and Favorable Working Conditions

Everyone who works with us throughout the entire value chain is entitled to conditions that respect their health, safety, well-being, and dignity, including a maximum number of working hours, rest periods during the day and week, and a paid vacation period each year.

The remuneration of the Group's employees considers the principle of fair compensation for work and the equality of pay between male and female labor for work of equal value, based on an objective assessment of the tasks to be performed (ILO Convention No. 100). The minimum compensation for employees of the Group shall not be less than that established by collective agreements and existing legal and regulatory frameworks applicable in the various countries, in accordance with the provisions of ILO Conventions.

We also believe that orientation and professional training are essential for the development of individuals and their skills, particularly in situations influenced by the energy transition, where our approach embraces the principles of circularity. We promote reskilling and upskilling through the implementation of specific programs to facilitate a fair transition.

## 2.2 Community and Society

### 2.2.1

#### Environment

We believe that mitigating climate change and protecting natural capital are among the most challenging issues in ensuring that people can enjoy their rights.

The protection of the environment and natural resources, the fight against climate change, and contributions to sustainable economic development are strategic factors in the planning, execution, and growth of our activities. We are also committed to accelerating the processes related to decarbonization and electrification to achieve the goals of limiting global warming in line with the Paris Agreement and to contribute to the attainment of the United Nations Sustainable Development Goals.

In testimony to our commitment, the five core principles (along with the 10 strategic objectives) of our [Environmental Policy](#) are:

1. Protecting the environment by assessing risks and preventing impacts;
2. Mitigating environmental degradation and climate change by setting objectives for improving processes and the environmental performance of assets;
3. Enhancing and promoting the environmental sustainability of products and services;
4. Creating shared value for the Company and its *stakeholders*;
5. Satisfying legal compliance obligations and voluntary commitments by promoting ambitious environmental management practices.

The Group's environmental policy also includes a specific commitment to respecting biodiversity.

### 2.2.2

#### Respect for the Rights of Communities

We recognize the influence, both direct and indirect, that our activities can have on the communities where we operate in; for this reason, responsible relationships with communities are a pillar of our strategy.

The individual conditions, economic and social development, and the overall well-being of the community are closely interconnected. For this reason, we intend to conduct our investments in a sustainable manner and promote initiatives that represent cultural, social, and economic

value, respecting local and national communities in order to foster social inclusion through education, training, and access to energy.

We are also committed to ensuring that our products and services are designed to be accessible to everyone and to not compromising the health and physical integrity of our customers, to the extent that is reasonably foreseeable.

### 2.2.3

#### Respect for the Rights of Local Communities

We are committed to respecting the rights of local communities and contributing to their economic and social development.

We also collaborate with suppliers, contractors, and partners who respect Human Rights and contribute to the socioeconomic development of the communities in which we operate.

We accomplish all of this not only through the promotion of preventive, free, and informed consultation activities but also through social inclusion actions (local labor, training in health and safety, development of local projects – including in *partnership* with local organizations). Indeed, understanding specific local needs and maintaining a continuous dialog with communities enables us to implement robust actions even in unprecedented and unpredictable emergency conditions.

In particular, in the planning and implementation of infrastructure projects, we are committed to duly considering, through appropriate environmental and social impact assessments, their environmental footprint and the respect for Human Rights in the area the project proposed concerns.

Using the Voluntary Principles on Security and Human Rights as a framework, we are committed to ensuring that private security forces operating to protect the personnel and property of the Group in our areas of activity act in line with applicable national laws and international rules and standards.

## 2.2.4

### Respect for the Rights of Indigenous and Tribal Peoples<sup>5</sup>

We pay special attention to the most vulnerable communities, such as indigenous and tribal populations, and are committed to upholding the United Nations Declaration on the Rights of Indigenous Peoples.

In the development of our projects we are committed to engaging all relevant *stakeholders* including indigenous and tribal communities, because we believe that the active involvement of these communities in the process is essential.

## 2.2.5

### Integrity: Zero Tolerance for Corruption

We adopt an approach that is founded on the respect for human rights, acknowledging the dual impact that corruption phenomena have. On one hand, they undermine the role of the State as a sovereign entity responsible for the welfare of its citizens, while on the other hand, they expose the most disadvantaged and marginalized members of society to the consequences of poorly-functioning public institutions and increased vulnerability.

For this reason we combat corruption in all its direct and indirect forms, recognizing it as one of the factors undermining institutions and democracy, ethical values, justice, as well as the well-being and development of societies.

We adopt organizational models and integrated prevention and risk containment systems for corruption, supported by the “Zero Tolerance for Corruption Plan,” one of the pillars on which our Anti-Corruption Control System is structured.

## 2.2.6

### Confidentiality and Privacy

We respect the confidentiality and right to privacy of our *stakeholders* and are committed to the proper use of the data and information provided to us by individuals working with us, clients, and other *stakeholders*.

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<sup>5</sup> These terms refer to the following:

- a) tribal peoples in independent countries who are distinguished from the other components of the national community by their social, cultural and economic conditions, and who live wholly or partially according to their own customs or traditions, or according to special laws or regulations;
- b) peoples in independent countries who are considered indigenous due to the fact that they are descended from peoples who inhabited the country, or in a geographical region to which the country belongs, at the time of the conquest, colonization or the establishment of the current borders of the State, and which, whatever their legal status, retain all or part of their social, economic, cultural and political institutions. (See Article 1 Paragraph 1, ILO Convention No. 169).

The protection of personal data represents a significant challenge for us in the era of digitalization and market globalization.

We handle personal data with respect for all fundamental rights and adhere to the freedoms and principles recognized by law, particularly respect for privacy and family life, the home, and communications, as well as the freedom of thought, conscience, and religion, and the freedom of expression and information.

“*Privacy by design*” (defined from the initial design phase of a business initiative) and “*by default*” (processing personal data to the extent necessary and sufficient for the intended purposes and for the period strictly necessary) are integral parts of our management and digitalization processes, as well as risk analysis and the protection of sensitive data.

The privacy of individuals is safeguarded by adopting international standards; the methods of processing and storing personal data are defined with the support of the *Data Protection Office* (DPO) in compliance with corporate policies and procedures as well as European and national regulations.

We are also committed to requesting that the same standards be adopted by all third-party companies that may be in a position to process customer personal data on our behalf. To this end, specific clauses are included in contracts with partners who use personal data for specific activities, such as sales services or customer satisfaction surveys.

## 2.2.7

### Communication

#### 2.2.7 Communication

We are committed to institutional and commercial communication that is non-discriminatory and respectful of diverse cultures, while also paying special attention to avoid negatively influencing the most vulnerable members of the public, such as children and the elderly.

Additionally, we require that contracts and communications sent to our clients be:

- clear and straightforward, formulated in language as close as possible to that commonly used by the *stakeholders*;
- in compliance with current regulations, without resorting to evasive or inappropriate practices;
- complete, ensuring that no relevant elements are overlooked in the customer’s decision-making process;
- available on company websites;
- accessible to ensure that no diverse abilities are overlooked.

## IMPLEMENTATION AND MONITORING

The implementation and monitoring of the commitments outlined in this Policy are based on an appropriate *Due Diligence* process.

Enel has established a process to assess the robustness of its management system in safeguarding human rights, in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Due Diligence for Responsible Business Conduct. The process encompasses the entire value chain across the various countries in which the Group operates. It allows for the assessment of both the level of alignment of processes and procedures with the management requirements of the United Nations Guiding Principles, as well as the degree of integration of adherence to the principles outlined in this Policy within business practices.

The assessment of perceived risk, in conjunction with the identification of any gaps, enables the identification of salient human rights issues and the analysis of organizational and control systems that safeguard the proper integration of human rights into business practices, identifying potential areas of improvement.

In particular, through the identification of the salient issues, the perspectives of the *stakeholders* involved are taken into account. The Due Diligence is conducted across the various countries where the Group operates, and involves relevant *stakeholders* and experts from diverse sectors, including civil society and academic institutions.

Specifically, direct and indirect workers, representatives of civil society from local communities and indigenous and tribal populations, unions, local institutions, businesses, industry associations, and clients are engaged.

Specific action plans are therefore developed for each country of presence, as well as a centrally managed improvement plan that has the objective of harmonizing and integrating, at global level, processes, and policies to be applied at local level.

Suppliers are monitored for Human Rights concerns to proactively identify potential issues and take appropriate follow-up actions.

The unit dedicated to the strategy and positioning regarding Human Rights is responsible for integrating the Human Rights Policy into business processes and ensuring the execution of *Due Diligence* activities.

The local sustainability units are responsible for integrating the Human Rights Policy within their respective countries.

### 3.1 Stakeholder Reports

The internal and external *stakeholders* of the Group can report<sup>5</sup>, anonymously, any violations – or suspicions of violations of the Human Rights Policy through a single platform accessible from the Group’s website ([link](#)). The platform allows you to submit reports in the following ways:

- in writing, via the web;
- by telephone;
- upon the request of the reporter, through a direct meeting scheduled within a reasonable timeframe, via the aforementioned channels.

The Audit Function receives and analyzes reports in compliance with applicable regulations. Enel is committed to ensuring that no retaliatory action is taken as a result of any reports made, understood as any act that might give rise to even the mere suspicion of being a form of discrimination or penalization. Additionally, no behavior, act, or omission – whether attempted or threatened – that causes or could cause unjust harm to the reporting individual, either directly or indirectly, will be tolerated. The confidentiality of the whistleblower’s identity is also ensured, subject to legal obligations.

If it is determined, following a report, that there has been a violation of the principles outlined in this Policy, the same procedure outlined in the Code of Ethics will be activated.

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<sup>5</sup> In line with the third Guiding Principle of the United Nations regarding access to remedy.

## 3.2 Review of the Human Rights Policy

The internal committees assess any modifications or additions to the current Human Rights Policy and submit these to the approval of the Board of Directors of Enel S.p.A.

## 3.3 Responsibilities of the unit responsible for strategy and positioning on Human Rights

The unit responsible for strategy and positioning regarding Human Rights is tasked with:

- programming and coordinate the implementation of the *Due Diligence* process, in conjunction with other relevant functions, in accordance with their respective competencies, integrating the regulatory requirements;
- disclosing Enel's performance regarding the commitments made in this document to its relevant *stakeholders*.

# 4 COMMUNICATION AND TRAINING

The Human Rights Policy is communicated to internal and external *stakeholders* through dedicated communication activities. In order to ensure its correct understanding by all Enel employees, a training plan is being developed to promote awareness of the principles contained therein.

# 5 DEFINITIONS

## Forced or compulsory labor

All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. (Article 2 Paragraph 1, ILO Convention No. 29).

## Business relationships

Relationships with business partners and enterprises in the value chain, as well as any other government or non-government entity, directly linked to the operations, products, or services of the enterprise. (Principle 13, "The Guiding Principles on Business and Human Rights: implementing the UN framework of 'Protect, Respect, and Remedy.'").

## Discrimination

The term discrimination includes both direct and indirect discrimination, respectively:

- a.** any distinction, exclusion or preference based on race, colour, sex, age, affective orientation and gender identity, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation;
- b.** any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. (Article 1 Paragraph 1, ILO Convention No. 111).

## Indigenous and Tribal Peoples

These terms refer respectively to:

- a.** peoples in independent countries who are regarded as indigenous on account of their

descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions;

- b) tribal peoples in independent countries whose social, cultural, and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations. (Article 1 Paragraph 1, ILO Convention No. 169).

## *Due Diligence*

Within the Guiding Principles on Business and Human Rights (Principles 17-21), the term due diligence on human rights refers to a continuous management system that an enterprise implements according to the industry it operates in, its operating environments, the size of the enterprise and other factors, to ensure that it respects human rights and that it is not a party to the abuse of those rights. This involves “identifying, preventing, mitigating and accounting” the potential negative impacts generated by the enterprise.

## **Partner**

Natural persons or legal entities having an interest in Enel related to the joint development of new projects. (Enel Code of Ethics).