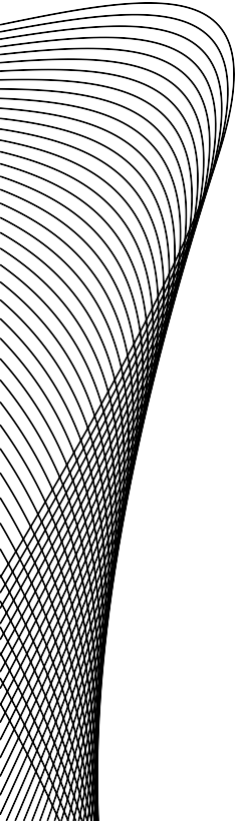
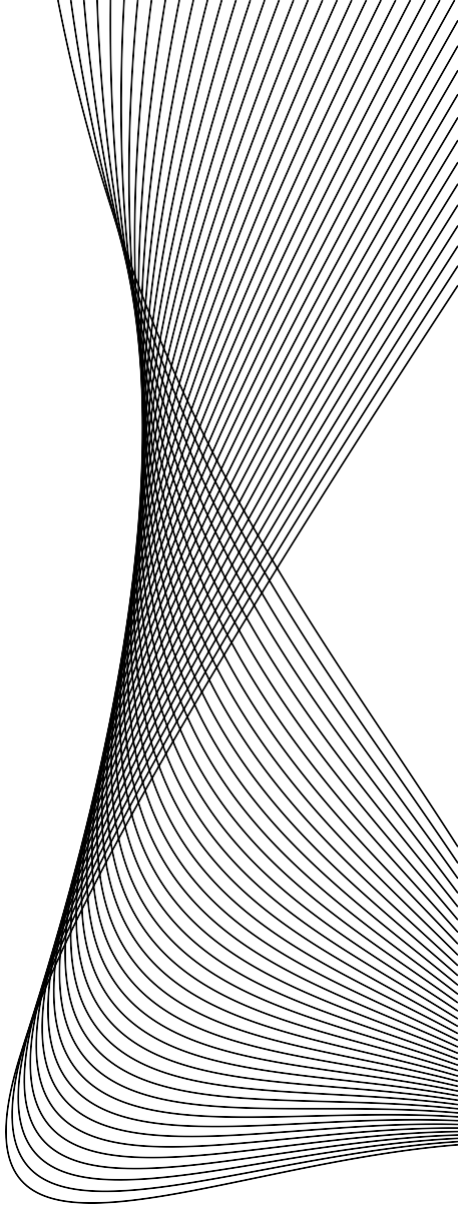


Human Rights Policy



Enel stakeholders believing a violation might have occurred may resort to the following contact channels:

- 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.

Reports can also be submitted to the relevant local channels of Enel companies

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1. ENEL'S COMMITMENT TO RESPECTING HUMAN RIGHTS

Enel is focused on creating sustainable value shared with all its internal and external stakeholders, innovating, and pursuing excellence and leveraging the respect of diversity throughout the entire value chain of the businesses in which it operates.

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. We belong to the territory, and we are an essential element in the lives of people, businesses, and society at large.

Our journey started by fostering access to electricity to an increasing number of people: we have then opened to new technologies, new services, new ways of using energy, new partnership models, engaging all our stakeholders as much as possible to create a more sustainable future together.

A sustainable strategy and an integrated business model enable contribution to the United Nations Sustainable Development Goals while balancing risks.

We have placed SDG 13 “Action to combat climate change” at the center. As a leader in the energy transition, which is a true transformation process, we would like to: decarbonize the energy mix and drive the growth of renewable capacity (SDG 7 “Clean and affordable energy”); electrify consumption, empower resilient and efficient infrastructure (SDG 9 “Industry, innovation and infrastructure”) and digital platforms and services (SDG 11 “Sustainable cities and communities”).

A fair and inclusive transition does not leave anyone behind and takes into account the needs of all the stakeholders, and, specifically, the most vulnerable ones. To this end we:

- proactively consider the needs and priorities of people and wider society because this leads to process and product innovation which is key for a competitive, inclusive and sustainable business model, including the adoption of circularity principles, protection of natural capital and of biodiversity;
- promote the involvement of the main external and internal stakeholders to enhance awareness and develop a constructive dialogue that can provide a valuable contribution to the creation of solutions that mitigate climate change.

We believe that business has the capability to contribute to positive impacts in society: the respect of Human Rights is a fundamental element to empower sustainable progress beyond pure compliance to existing regulations.

Through the Policy hereof we commit to respect all Human Rights, and specifically the ones more strictly connected to our value chain, following the outcome of our stakeholders consultation (internal stakeholders, companies, suppliers, human rights experts, think tanks, NGOs) held in line with the “UN Global Compact Guide for business: how to develop a Human Rights Policy”.

We commit to monitor the implementation of the policy hereof i) through a specific due diligence process, ii) the promotion of practices in line with a just and inclusive transition, and iii) by reporting evidence of action plans developed to prevent and remedy should critical issues occur.

The policy hereof was approved by the Board of Directors of Enel SpA on February 5, 2013, and subsequently amended on November 4, 2021, and sets out the commitment and responsibilities that all the people working in our corporation (Enel SpA and its subsidiaries¹) undertake in relation to Human Rights, and especially those applicable to our business activities and corporate operations, as well as the standards that our stakeholders should abide by.

1.1 INTERNATIONAL REFERENCES

This Policy supports the following fundamental values of International and European Law and applies their founding principles:

1. The 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
2. The core conventions of the International Labor Organization (ILO) - n. 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. ILO Conventions n. 107 and n. 169 on the Rights of Indigenous and Tribal Peoples
5. The European Convention on Human Rights

The latest versions of the following business standards and voluntary initiatives have also been taken into consideration:

1. The UN Global Compact principles
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises
3. The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy
4. The “UN Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework”
5. UN Declaration on Indigenous People
6. The UK Modern Slavery Act 2015
7. International Finance Corporation Standard no. 5 of ‘Performance standards on Environmental and Social Sustainability’

1.2 INTERNAL REFERENCES

The following internal documents are linked to and support the principles set out in this Policy:

1. Code of Ethics
2. Zero Tolerance of Corruption Plan
3. Enel ‘Global compliance program’
4. The Organization and Management Model pursuant to Legislative Decree no. 231 of 8 June 2001 (“231 Model”) and other global corporate criminal risk prevention models
5. Global Framework Agreement with Global Unions
6. Application of the General Data Protection Regulation (EU regulation 2016/679) 25/05/2018
7. Health policy n° 179 of 12/02/2014
8. Global Diversity and Inclusion Policy, n. 27, September 21, 2015
9. Global Harassment Policy n. 431, June 11, 2019
10. Enel Statement against harassment (2020)
11. Digital Accessibility Policy, n. 1,142, June 4, 2021
12. Environmental policy, February 2018 update
13. Biodiversity policy, n. 474, December 20, 2019

2. PRINCIPLES

We have selected the principles hereafter based on their relevance to our business activities and relationships, and on the outcome of the stakeholders' consultation process mentioned before.

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

By stakeholders, we refer to any party with a direct or indirect interest in Enel Group's business, such as customers, people working in the corporation, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them.

Specifically, in addition to guaranteeing the necessary quality standards, suppliers are requested to adopt best practices in terms of human rights and working conditions (including adequate hours worked, 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 respect for data protection by design and by default.

With our commitment we are striving for sustainable progress, to make our company and the communities in which we operate more prosperous, more inclusive and more resilient, without leaving anyone behind.

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 labor² and any form of slavery and human trafficking - as defined by ILO Convention n. 29 - and we do not confiscate either money or identity papers to retain workers against their will.

We consider children and young workers as groups mostly likely affected, that is why we take the utmost care in respecting their rights across all the activities connected to the value chain.

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-discrimination³

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.

We are committed to provide 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 particular attention to people with disabilities.

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.

2.1.4 Health, safety, and well-being

We consider the health, safety, and psychological, relational, and physical well-being of individuals the most precious asset to be protected in any moment, at work, as well as at home and during leisure time.

We are committed to developing and disseminating a robust health, safety, and well-being culture throughout our Group to ensure that workplaces are free from health and safety hazards and to promoting behaviors oriented towards work-life integration.

We are actively involved in promoting personal and organizational well-being as an enabler of the engagement and innovative potential of people.

By doing so, we aim at increasing awareness of risks and promoting responsible behaviors.

Our suppliers and contractors are 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.

Our commitment also unfolds in integrating health and safety in processes and in training activities, in a rigorous selection and management of suppliers/contractors, in sharing knowledge and in constantly benchmarking our practices.

2.1.5 Just and favorable working conditions

Every person working with us, along the entire value chain, has the right to conditions that respect their health, safety, well-being and dignity, maximum working hours, daily and weekly rest periods and an annual period of paid leave.

Remuneration of the people we employ is based on fair reward principles as well as respecting pay equality for men and women carrying out the same job (ILO Convention n. 100). Minimum compensation cannot be lower than the minimum living wage set in the collective labor contracts and law regulations in force in each country in accordance with the provisions of the ILO Conventions.

We also 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 and that prompt us to adopt a circularity-based approach which translates into requalifying and enhancing existing potential by way of reskilling and upskilling programs to foster a just transition.

2.2 COMMUNITIES AND SOCIETY

2.2.1 Environment

We believe the current challenge posed by climate change phenomena is the main impediment to people's enjoying their own rights.

[Protection of the environment and natural resources](#), climate action, and contribution to a sustainable economic development are strategic factors in the planning, performance, and development of our operations, alongside our broader commitment to accelerate the decarbonization and electrification processes to allow the global warming containment objectives in accordance with the Paris Agreement while at the same time driving achievement of the United Nations Sustainable Development Goals.

Our commitment is testified by the four key principles (alongside the 10 strategic objectives) of our environmental policy:

1. Protecting the environment by preventing impacts to it;
2. Improving and promoting the environmental sustainability of products and services;
3. Creating shared value for the Company and stakeholders;
4. Complying with legal obligations and voluntary commitments, promoting ambitious environmental management practices.

Our environmental policy also includes a specific commitment on respecting [biodiversity](#).

2.2.2 Respecting the rights of communities

We are aware that our activities can have a direct or indirect influence on the communities where we operate: that is why responsible community relations constitute a pillar of our strategy.

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 also commit 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.

2.2.3 Respecting the rights of local communities

We are committed to respecting the rights of local communities and to contribute to their economic and social growth.

Likewise, we collaborate with suppliers, contractors and partners that respect Human Rights and contribute to the social-economic development of the communities where we operate.

This goes through and is not limited to promoting free, prior, and informed consultation activities and implementing social inclusion actions (local manpower, health and safety training, development of local projects - also in partnership with local organizations). Indeed, knowledge of the specific local requirements and a continuous listening to the communities needs allow us to develop robust actions also in unexpected and unprecedented emergency conditions.

More specifically, in the designing and construction of infrastructure projects, we commit to taking due account, within proper environmental and social impact assessments, of their environmental footprint and of the respect of Human Rights in the areas where the projects will be developed.

Taking as a reference the Voluntary Principles on Security and Human Rights, we require that private security forces protecting Group's personnel and assets in operating areas act in the same manner and in a way consistent with the applicable national law and regulation and international standards.

2.2.4 Respecting the rights of indigenous and tribal peoples⁴

We pay particular attention to the most vulnerable communities, such as indigenous and tribal ones, and commit to respect the United Nations Declaration of 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.

2.2.5 Integrity: zero tolerance of corruption

We reject corruption in all its forms, both direct and indirect, since we believe it is one of the factors undermining institutions and democracy, ethical values and justice, and the well-being and development of society.

To this end, we reiterate our commitment to fight corruption through a plan called "[Zero Tolerance of Corruption](#)" which is one of the pillars on which our anti-bribery management system is grounded.

2.2.6 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.

Data protection by design (i.e., incorporated from the design of each corporate process), and by default (i.e., processing limited only to the strictly necessary extent and just to the period needed to perform data collection) are an integral part of our digitalization processes, as are risk analysis and the protection of sensitive data.

Privacy is assured by adopting international standards and the way data is processed and stored is defined with the support of the Data Protection Officer (DPO) in compliance with our policies and any European and national regulations.

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

2.2.7 Communications

We commit to ensuring that institutional and commercial communications are non-discriminatory and are respectful of different cultures, while also not adversely affecting the most vulnerable audiences, such as children and the elderly.

In addition, we require 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;
- abide by statutory legislation, without resorting to evasive or improper practices;
- be exhaustive and not omit any relevant item that might affect the customer's decision;
- be available on our websites;
- be accessible, in order to accommodate the needs of people with disabilities.

3. IMPLEMENTATION AND MONITORING

Implementation and monitoring of our commitment to the principles illustrated hereof relies on an appropriate due diligence process⁵.

The perceived risk assessment, together with the gap analysis, makes it possible to assess the residual risk and define any improvement actions required. 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. Any necessary remedy highlighted by such process is included in the Group Sustainability Plan.

Suppliers are constantly monitored insofar as Human Rights are concerned thanks to artificial intelligence tools that enable early identification of elements that might become critical and that prompt the development of the necessary ensuing actions.

Management of the positioning on human rights is entrusted to the Sustainability Planning & Performance Management & Human Rights unit within the Innovability function. The unit is also responsible for integrating the Policy on Human Rights in corporate processes and monitoring that due diligence activities are carried out properly.

Country sustainability units are in charge of implementing the Policy on Human Rights locally.

3.1 STAKEHOLDERS GRIEVANCE

Stakeholders, whether internal or external, believing a violation might have occurred, may either resort to specific violation reporting channels or to the Audit Function⁶.

The Audit function analyzes the grievance, contacting the author, if necessary, and the person responsible of the alleged violation, ensuring uniform treatment at Group level, in compliance with company policies and local regulations.

Whenever, following a grievance, a violation of the principles contained in the Policy hereof is ascertained, the relevant procedure provided for in the Code of Ethics shall be implemented⁷.

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

Whistleblowers may resort to the following contact channels:

- 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.

Grievances can also be submitted to the relevant local channels of Enel companies.

3.2 TASKS OF THE BOARD COMMITTEES OF ENEL SPA

The Control and Risk Committee and the Corporate Governance and Sustainability Committee, having examined the Human Rights Policy hereof and having submitted its amendments to the approval of the Board of Directors, will evaluate any further amendments or integrations thereof and propose them to the Board of Directors.

3.3 TASKS OF THE SUSTAINABILITY PLANNING & PERFORMANCE MANAGEMENT (SPPM) & HUMAN RIGHTS UNIT

The SPPM-Human Rights unit has the following duties:

- planning and coordinating the implementation of the due diligence process, in conjunction with the other relevant functions involved, to the extent of the areas of their responsibility;
- reporting to the Control and Risk Committee and to the Corporate Governance and Sustainability Committee on the implementation of the due diligence process;
- reporting annually within the Group's Sustainability Report on Enel's performance with respect to the commitments stated in the document hereof.

4. REVISION

Based on the Control and Risk Committee and Corporate Governance and Sustainability Committee proposal, this Policy will be revised periodically to ensure its adequacy and effective implementation.

All revisions shall be subject to approval by the Board of Directors of Enel SpA.

5. COMMUNICATION AND TRAINING

The Human Rights Policy shall be circulated to internal and external stakeholders through specific communication initiatives. Training initiatives will be carried out to ensure that the Policy is properly understood by all Enel employees.

6. DEFINITIONS

Forced and 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.
(Art. 2 Par. 1, ILO Convention n. 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 “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework”)

Discrimination

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

- a) any distinction, exclusion or preference based on race, colour, sex, age, sex orientation, 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.
(Art. 1 Par.1, ILO Convention n. 111)

Indigenous and Tribal Peoples

These two terms refer to, respectively:

- 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.
(Art. 1.1, ILO Convention n. 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)

1 “Enel” refers to Enel SpA and all of its direct and indirect subsidiaries

2 Forced or compulsory labour means: 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 (See Art. 2.1 of ILO Convention n. 29).

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

- a) any distinction, exclusion or preference based on race, colour, sex, age, sex orientation, 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. (See Art. 1.1 of ILO Convention no. 111)

4 These terms refer to:

- a) 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;
- b) 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. (See Art. 1.1 of ILO Convention no. 169)

5 Within the Guiding Principles on Business and Human Rights (Principles 17-21), 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

6 This is in line with the third Pillar of United Nations Guiding Principles regarding ‘Access to remedy’

7 Principle 4.5 of the Code of Ethics