

Artificial Intelligence Policy

Artificial Intelligence (AI) – including the Generative and the Agentic - represents a key enabling technology for business processes, operational efficiency and data-driven decision making. At the same time, its adoption introduces potential risks related to data protection, cybersecurity, ethics, human rights, environmental impact, and regulatory compliance. In this evolving context, and in alignment with international standards and emerging regulatory frameworks, including the EU AI Act, **Enel has established a structured governance framework to ensure the responsible, ethical and sustainable use of AI technologies across the Group.**

The Policy is formally endorsed at **Executive Management** level and is embedded within Enel's broader system of corporate policies covering data protection, information security, ethics, digital governance, risk management and sustainability, in alignment with international standards and emerging regulatory frameworks, including the EU AI Act.

This integrated framework ensures that AI systems are designed, developed, acquired, and deployed in a manner that safeguards fundamental rights, promotes trust, and supports long-term value creation for stakeholders.

Enel's AI Governance framework is further detailed in internal reference policies and organizational instruments, including **a policy about the "AI Governance: Primary Rules for Conduct"** and **a policy on "Artificial Intelligence Risks and Opportunities (AIRO)"**, which set out a risk-based approach aligned with the EU Artificial Intelligence Act. In particular, Enel applies a structured AI risk assessment process (including first-level screening and, where applicable, a second-level assessment including the AIRO assessment) and adopts an organizational model with dedicated AI roles (e.g., **AI Hero** and **AI Risk Referent**) to ensure consistent oversight, traceability and accountability across the AI lifecycle.

From a **regulatory compliance and risk management** perspective, Enel policies ensure that AI systems operate in conformity with applicable data protection legislation and internal data governance rules. The processing of personal and sensitive data in AI solutions is subject to principles of lawfulness, proportionality and security, supported by privacy-by-design and privacy-by-default safeguards throughout the AI lifecycle, including the use of Enel's established tools and processes for privacy assessments where applicable (e.g., DPIA and related assessments). AI-related assets—including models, datasets and supporting infrastructures—fall within Enel's cybersecurity perimeter and are subject to preventive, detective and corrective controls aimed at protecting information integrity, confidentiality and availability, consistently with **Enel's Cyber Security Framework** and related cyber risk management procedures.

Enel's governance framework also addresses **ethical and social risks associated with AI**, promoting the responsible use of data and algorithms to mitigate risks of unfairness, discrimination or unintended harm. Attention is given to data quality, representativeness and model behavior, with the objective of ensuring that AI systems support inclusive, equitable and non-discriminatory outcomes, in line with Enel's values and ESG commitments.

A key principle underpinning Enel's AI governance is the **maintenance of meaningful human oversight and accountability**. AI systems are intended to support human decision making and operational processes, not to replace human responsibility, particularly in sensitive or high-impact contexts. Enel policies require that appropriate mechanisms be in place to enable supervision, intervention and

validation by qualified personnel, ensuring that final accountability for decisions and outcomes remains clearly assigned within the organization.

Transparency and traceability are integral to Enel's AI governance model. Internal requirements promote clarity regarding the purpose, scope, functioning and limitations of AI systems, supporting explainability and auditability proportionate to the level of risk and impact. In addition, where AI systems trigger transparency obligations (e.g., AI intended to interact with humans or generative AI producing synthetic or manipulated content), Enel requires appropriate user information measures and, where relevant, visible labeling of AI-generated or manipulated content. These measures are implemented coherently with Enel's information classification and protection framework (including **Enel's policy about "Information, Classification and Protection"**) to ensure that disclosure and traceability do not compromise confidentiality or intellectual property.

Clear governance roles and responsibilities are defined for the end-to-end management of AI systems, from design and development to deployment and monitoring. Enel's governance model, includes dedicated roles (e.g., **AI Hero** and **AI Risk Referent**), and-structured coordination mechanisms, supporting consistent execution of AI risk assessment, documentation and lifecycle monitoring across the organization. At Group level, strategic and cross-functional alignment is supported through governance bodies and working groups established within Enel's AI Governance framework (e.g., **Artificial Intelligence Committee** and **AI Working Groups**), ensuring that AI adoption remains aligned with corporate priorities, regulatory evolution and internal control requirements. The use of AI does not alter Enel's established accountability frameworks, and outcomes supported by AI remain subject to corporate oversight, internal controls and compliance obligations.

In line with Enel's **environmental sustainability objectives**, the assessment and adoption of AI technologies also consider their ecological footprint. Particular attention is paid to energy efficiency, computational resource usage and the sustainability performance of data centers and technology providers, consistent with the Group's decarbonization strategy and environmental commitments.

Finally, Enel's governance framework explicitly prevents the development, purchase or deployment of AI systems that are incompatible with ethical principles, fundamental rights or applicable regulations. This includes AI practices prohibited under the EU AI Act (e.g., manipulative practices, exploitation of vulnerabilities, social scoring mechanisms or unauthorized biometric surveillance), which are excluded through Enel's risk assessment and approval processes and in alignment with internal ethical standards.

These principles are implemented through Enel's internal policies, standards and control processes, and are supported by governance bodies, risk assessments, training initiatives and continuous monitoring activities. Together, they ensure that AI technologies contribute positively to Enel's strategic objectives while respecting regulatory requirements, ESG commitments and stakeholder expectations.

Artificial Intelligence Program

To support the responsible, secure and sustainable adoption of AI, **Enel has launched a Group-wide AI Program**, composed of several initiatives, designed to operationalize its policy principles through concrete governance mechanisms, risk controls and continuous oversight. The Program aims to ensure that AI technologies are deployed in a manner consistent with regulatory expectations, ethical standards and Enel's ESG commitments, while enabling innovation and business value.

A core component of the AI Program is the **risk-based governance of AI capabilities**, with particular attention to use cases that may present heightened ethical, legal or social risks. Enel's approach is operationalized through structured assessment phases and the involvement of designated roles (e.g., **AI Hero** and **AI Risk Referent**) to ensure that each Digital Initiative involving AI is screened and, where required, assessed in depth. For AI solutions acquired from third parties ("buy" approach), Enel's procurement process requires the availability and verification of supplier technical and contractual documentation for AI-related functionalities and the completion of the applicable second-level AI risk assessment prior to finalizing the purchase request, in line with Enel's ICT procurement governance (e.g., OPs governing Purchase Request management) and the internal AI governance framework. Access to sensitive or high-risk AI functionalities—such as those related to biometric identification, surveillance or similar technologies—is subject to restrictive controls, formal authorization processes and enhanced oversight, ensuring that such capabilities are only considered where legally permitted, justified by legitimate purposes and aligned with internal ethical standards.

The Program also promotes **transparency and responsible use of AI outputs**. AI-generated content and outcomes produced by AI-driven decision processes are managed in a way that supports appropriate disclosure and distinguishability, enabling users and stakeholders to understand when and how AI contributes to decisions, recommendations or content generation. In addition, Enel requires verification and responsible use of outputs, especially where generative AI may produce incomplete or inaccurate content, and applies specific transparency measures when systems fall under "limited risk" transparency obligations (e.g., informing users and labeling synthetic content), consistently with internal information protection and data handling rules.

To ensure the reliability and ongoing performance of AI systems, the AI Program includes **continuous lifecycle management practices**. Deployed AI models are monitored over time to detect performance drift, degradation or unintended behavioral changes, with defined mechanisms for review, correction and retraining where necessary. Regular assessments are conducted to evaluate fairness and potential bias, ensuring that systems remain aligned with ethical principles and do not produce discriminatory or unintended impacts as conditions evolve.

Environmental sustainability is an integral dimension of the Program. In alignment with Enel's decarbonization strategy, the AI Program promotes initiatives—both internally and in collaboration with technology partners and suppliers—aimed at reducing the **ecological footprint of AI models and data centers**. This includes attention to energy efficiency, optimization of computational resources and responsible selection of infrastructures and providers.

From a stakeholder protection perspective, the AI Program foresees **mechanisms allowing individuals to raise concerns or contest AI-supported outcomes**, where relevant. These mechanisms are

designed to ensure that decisions influenced by AI systems remain subject to human review and accountability, reinforcing trust and alignment with fundamental rights. Where appropriate, concerns may be raised through Enel's established reporting and escalation channels for rights- and compliance-related matters, ensuring traceability of the report, timely handling and, where necessary, remediation actions.

A foundational enabler of the Program is **capacity building and awareness**. Enel provides targeted training to its employees on the ethical, secure and responsible use of AI, ensuring that personnel involved in the design, deployment and use of AI systems understand associated risks, governance requirements and their individual responsibilities.

To reinforce credibility and alignment with best practices, Enel's AI Program is supported by a structured **AI management system**, designed to be subject to external verification against recognized international standards. Independent assessments contribute to ensuring robustness, effectiveness and continuous alignment with regulatory and ESG expectations.

Through this AI Program, **Enel translates its policy commitments into operational practices**, embedding governance, accountability and sustainability into the day-to-day use of AI technologies, and ensuring that innovation proceeds hand in hand with responsibility, transparency and long-term value creation.