

Protocol of action in dealing with public officials, control entities and authorities

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- *The purpose of this document is to establish clear principles of action to guide the actions of those collaborators, executives and managers who deal with public officials, State entities and other organizations in the institutional sphere that serve to prevent the commission of illicit practices, ensuring the application of the principles of transparency and trust.*

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1. Objective

The objective of implementing a protocol of good practices in dealing with public officials, State entities and other organizations in the institutional sphere is to provide the Organization with a document that will allow:

- Establish clear principles of action to guide the actions of those collaborators, executives and managers who, in the exercise of their functions, must interact with public officials, State entities and other organizations in the institutional sphere, in order to promote transparency and prevent the commission of illicit practices.
- To protect and respect competition regulations and the correct functioning of markets, by preventing and eliminating practices that entail illicit competitive advantages.
- To ensure the application of the principles of transparency and correctness in relations with public officials, State entities and other organizations in the institutional sphere.
- Ensure that all employees of Enel Colombia, its subsidiaries and affiliates in the perimeter of Colombia, Costa Rica, Guatemala and Panama carry out their occasional or permanent institutional relationship dynamics, subject to the legislation in force in the perimeter of the countries where Enel¹ and the global transparency and anti-corruption policies of the Enel Group (the "Group").

2. Scope

The criteria and guidelines contained in this protocol will be applied in all Enel companies, always respecting their corporate bodies and their own management and administrative bodies, which may also adopt the preventive measures they deem most appropriate to their own reality. preventive measures that they deem most appropriate to their business reality. business reality.

In companies incorporated under the laws of Colombia, Costa Rica, Guatemala and Panama and resident in these countries in which the Group's shareholding is directly or indirectly 100%, the provisions contained in this document shall apply in full.

In the rest of the companies in which the Group is directly or indirectly controlling, without owning 100% of the shares and/or quotas, the representatives of these companies in the governing bodies and in the management, bodies shall promote their adoption in accordance with the regulations applicable in each country.

3. Application

This Protocol shall apply to all Enel Company personnel, whether in a general or managerial role, and generates commitments to institutions.

¹ Hereinafter, the companies of Enel Colombia S.A. E.S.P., affiliates and subsidiaries in Colombia, Central America and all the companies of the group, including associations, funds and foundations of which Enel is the source of the institution, will be referred to as "Enel".

4. Concepts

- **Contributor:** categorized in the policy as first, second and third level, depending on the relationship with the with the Public Administration.
- **Public Administration:** State executives in charge of administrative activities and functions.
- **Control Entities:** These are those bodies entrusted by Colombian and Central American legislation with functions related to disciplinary control, ombudsman, and fiscal control. They are not attached or linked to the branches of public power.
- **Institutional Scope:** That in which an authority and/or entity of a public or union nature is present at national, regional, and local level.
- **Levels of trust and value creation with institutions:** Definition of the interlocutors designated by Enel Companies, according to their role, to serve the institutional sectors according to the structure of the entities and in accordance with the Trust and Value with Institutions policy.
- **User areas:** Areas responsible for the institutional relationship because they are the holders of the corporate objectives to be leveraged through the institutional sectors.

5. Content

In the relations with public officials, government agencies and other organizations in the institutional sphere, always avoid any conduct that could be misinterpreted as an attempt to obtain consideration for as an attempt to obtain undue consideration.

In those cases, in which the relationship with the Public Administration takes place under the procedures governed by external regulations, this shall be a reference and obligatory compliance.

5.1 GENERAL CHARACTER

The following principles of action shall apply:

- **Representation**

In all interactions within the institutional sphere, the classification of levels of trust and value with institutions set out in the policy of Trust and Value with Institutions must be observed, which defines the interlocutors designated by Enel Companies, according to their role, to serve the institutional sectors according to the structure of the entities.

- **Segregation of duties**

In any relationship with the Public Administration that directly or indirectly involves the assumption of economic commitments by Enel's Companies, an adequate separation of functions must be guaranteed between who negotiates and who manages and authorizes the flow of resources deriving from such negotiation, with the mandatory participation and coordination of both in the process.

- **Traceability and transparency**

In order to ensure transparency and legality in the actions of the Organization and its representatives in their interactions with public officials, entities that make up the State and other organizations in the institutional sphere, the documentary support of the meetings and/or gatherings (reports, notes, or minutes of meetings) must be guaranteed and must be

reported periodically to the Institutional Relations area, according to the format and frequency established by said area. In order to keep a record of the people contacted and the documentation exchanged, as well as the safeguarding of the same.

Likewise, the principles of confidentiality and information security must be complied with.

In addition, in economic relations with the Public Administration, sufficient traceability must be ensured as to the origin and destination of funds and transparency as to the nature of any contract that may exist between the parties. Cash payments are expressly prohibited, unless expressly provided for in the relevant regulations, as an alternative procedure for executing payment

- **Gifts and hospitality**

Any form of gift, present, favor or promise of employment to national or foreign public officials that may influence their independence of judgment or induce them to guarantee any type of consideration is prohibited, in accordance with the provisions of section 3.5 of the Code of Ethics. The provisions of the "Gifts and Hospitality" Policy shall also be complied with in this regard.

- **Proceedings and formalities**

It is forbidden to deliver money or valuables to facilitate or expedite procedures or formalities of any agency or public administration.

- **Duty to report**

All employees of Enel Companies must manage their relationship with public officials, State entities and other organizations of this nature, reporting institutional meetings with the mechanism and frequency established by the Institutional Relations Division and subject to the policy of Trust and Value with these entities, following the guidelines established in the local legislation in force on issues of transparency and anti-corruption.

5.1 OPERATIONS OF HIGHER SENSITIVITY

The following are considered to be more sensitive operations, for which additional control must be exercised:

- Participation in national or foreign public tenders and/or bids in which any Enel Company is awarded.
- Participation in procedures for obtaining subsidies and public aid from national or foreign public entities.
- Participation in procedures for obtaining licenses or non-recurring administrative authorizations granted by the Public Administration.
- The relationship with public officials or representatives of institutions that have autonomous competence to make a decision that may entail significant direct economic advantages for Enel's Companies, for which there are no external regulations that regulate it.

In addition, in the event of contracting external third parties to interact on behalf of Enel Companies with the Public Administration and other organizations in the institutional sphere, express acceptance shall be obtained from them of the Code of Ethics, the Zero Tolerance Plan for Corruption and the Criminal Risk Prevention Model.

6. Responsibilities

Employees of Enel Group companies in Colombia and Central America

Fulfill the provisions of this Protocol, the Trust and Value policy with institutions, the Trade Union Management Procedure and the provisions of local legislation in force regarding transparency and anti-corruption.

Institutional Relations Division Colombia and Central America

Ensure compliance with the provisions of the Trust and Value with Institutions policy and the Trade Union Management Procedure, ensure awareness and dissemination of these, in conjunction with the communications and people and organization management.

Audit Management Colombia and Central America

Verify compliance with the provisions of this Protocol.

People and Organization Management Colombia and Central America

Ensure adequate dissemination of this document to the entire organization, including training on it.

7. Entry into Force and Validity

This document shall apply as of the day following the date of its promulgation and shall remain in effect until it is amended or repealed by a subsequent document.

CHAPTER III.

CONDUCT CRITERIA IN RELATIONSHIPS WITH SUPPLIERS AND PARTNERS

3.23. CHOICE OF SUPPLIER

The purchasing processes are based on the search for the maximum competitive advantage for Enel, in granting equal opportunities for each supplier; Likewise, they are based on pre-contractual and contractual behaviors focused on essential and reciprocal loyalty, transparency and collaboration. The services of the suppliers guarantee the necessary quality standards and must reflect the commitment to adopt the best practices, speaking in terms of human rights and working conditions, health and safety at work, environmental responsibility and respect privacy by design and by default.

In particular, Enel people in charge of these processes must:

Not deny anyone in possession of the established requirements, the possibility of competing in the stipulation of contracts, adopting objective and transparent criteria in the election of the list of candidates.

Ensure sufficient competition with an adequate number of companies for each tender. Enel has a supplier registry, whose qualification criteria do not constitute an access barrier.

For Enel, the following are reference requirements:

The timely documented availability of means, including financial means, organizational structures, capacities and project resources, know-how, etc.;

The existence and effective action in cases where the Enel specifications of adequate management systems for the company are contemplated.

In any case, if the supplier, when carrying out its activity for Enel, adopts behaviors in disagreement with the general principles of this Code of Ethics, Enel will be entitled to take the appropriate measures to prevent other possible occasions of collaboration.

3.24. CHOICE OF PARTNER

The selection of partners made before entering into new business relationships to assess the reliability of the potential other party is regulated by specific internal procedures, which seek to ensure consistency with the requirements of the Code of Ethics.

3.25. INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS

At Enel, relations with suppliers are governed by common principles and are subject to constant monitoring. These relationships also include financial and advisory contracts. The stipulation of a contract with a supplier must always be based on extremely clear relationships, to avoid possible forms of dependency. So, by way of example and not exhaustively:

It is not considered correct to induce a supplier to stipulate an unfavorable contract for him, making him understand that there is the possibility of a more advantageous alternative contract; In general, long-term binding projects that contemplate short-term contracts and that demand continuous renewals with price revisions are avoided;

Special attention must be devoted to the stipulation and management of contracts, the estimated amounts of which are especially relevant with respect to the supplier's turnover. To guarantee the maximum transparency and efficiency of the purchasing process, the periodic rotation of the people in charge of purchasing is encouraged and, likewise, the following is established:

The separation of charges between the unit that requests the supply and the unit that stipulates the contract;

An adequate reconstruction of the elections held;

The conservation of the information and official documents of the tender and contract during the periods established by current regulations.

Finally, to guarantee transparency in relations, Enel carries out -when the conditions are met- a verification of the ownership structures of the suppliers themselves.

3.26. PROTECTION OF ETHICAL ASPECTS IN ORDERS

From the perspective of conforming the supply activity to the ethical principles adopted, Enel undertakes to request, for special requests, requirements of a social nature (for example, by introducing specific sustainability parameters in the award formulas). Violations of the general principles of the Code of Ethics will trigger sanctioning mechanisms also aimed at preventing

crimes that may entail administrative responsibility for Enel. For this purpose, specific clauses are established in the individual contracts.

In particular, contractual clauses are introduced in contracts with suppliers that contemplate: Adherence by the supplier to specific social obligations (for example, measures that guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, the protection of child labor or adherence to the Principles of the Global Compact);

The possibility of resorting to control actions to verify compliance with said requirements.

CHAPTER IV.

CRITERIA OF CONDUCT IN RELATIONS WITH THE COMPANY

3.27. ENVIRONMENTAL POLICY

Enel pursues goals that are consistent with those that are strategic in environmental matters. The protection of the environment and natural resources, the fight against climate change and the contribution to sustainable economic development are strategic factors in the planning, exercise and development of Enel's activities. To take advantage of all the possible synergies, the definition of the environmental policy and its action are managed in a unitary and coherent way. Said management:

Defines environmental policies and sustainable industrial development;

It prepares the action guidelines of the environmental policy;

Identifies the indicators and guarantees the monitoring and control of the development of the company's actions in terms of environmental impact;

Follows the evolution of national and international environmental legislation and establishes application references for subsidiaries;

It takes care of relations with entities, institutes and agencies in the environmental field, promotes, acts and coordinates agreements with said subjects and institutions.

Each group company internally considers reference professional figures and/or operating structures in relation to specific tasks and problems.

3.28. STRATEGIES AND TOOLS OF ENVIRONMENTAL POLICY

Enel's environmental policy is also based on the awareness that the environment can represent a competitive advantage in a market that is ever larger and more demanding in terms of quality and behaviour. Enel's strategy is based on an approach to investments and activities that respond to the principles of sustainable development; in particular:

Allocate a significant share of investments to the production of energy from renewable sources; In the sphere of national and international organizations and programs, support actions and behaviors that consider the environmental variable to be strategic.

Enel promotes the following environmental policy tools:

Voluntary agreements with environmental institutions and associations relevant environmental associations;

Environmental management systems, which are certified according to the international standard ISO 14001 and the European regulation EMAS (Community Environmental Management and Audit System), and which are committed to the continuous improvement of performance and environmental organization;

A periodic reporting system (reports) of environmental data, which ensures the control of the performance of the various industrial activities;

Environmental awareness and training activities for people in order to publicize the initiatives internally and increase skills and professional abilities/skills;

Programs for a rational use of energy for customers;

Implementation of portals dedicated to the dissemination of the "culture" of environmental protection and the promotion of Enel's initiatives in the territory.

3.29. ENVIRONMENTAL COMMUNICATION

Annually, Enel reports on the performance of the environmental policy and the coherence between the objectives and the results obtained through the publication of the sustainability report that illustrates:

The main objectives and environmental results (energy efficiency, development of renewable sources, use of water, reduction of emissions, waste management, etc.);

The most important environmental events and/or projects (for example: certifications of environmental management systems, adaptations of facilities, voluntary agreements, initiatives of various kinds for the protection of the environment and the territory). Enel undertakes to allow access to environmental information, in compliance with industrial confidentiality requirements.

3.30. ECONOMIC RELATIONS WITH PARTIES, TRADE UNION ORGANIZATIONS AND ASSOCIATIONS

Enel does not finance parties in Colombia or abroad, nor their representatives or candidates, nor does it sponsor congresses or parties with the exclusive purpose of political propaganda. It refrains from putting pressure, directly or indirectly, on political exponents (for example, by granting its structures, accepting indications for hiring, consulting contracts). Enel does not give contributions to organizations with which there may be a conflict of interest (for example, unions, environmental associations or consumer protection associations); instead, Enel can cooperate also from a financial point of view, with these organizations for specific projects based on the following criteria:

Purposes attributable to Enel's mission;

Clear and documentable destination of the resources;

Express authorization by the functions in charge of managing said relationships.

3.31. INSTITUTIONAL RELATIONS

Relations with Colombian or international institutions are developed exclusively under forms of communication to assess the implications of legislative and administrative activity in Enel, to respond to informal requests and inspection acts (consultations, interpellations, etc.), or in to publicize Enel's position on relevant issues.

To this end, Enel undertakes to:

Establish, without discrimination, stable channels of communication with all institutional interlocutors at the international, community or territorial level;

Represent the interests and positions of the subsidiaries in a transparent, rigorous and consistent manner, avoiding collusive behavior.

In order to guarantee maximum clarity in relations, contacts with institutional interlocutors take place exclusively through referents who have received an explicit mandate.

Enel adopts specific organizational models for the prevention of crimes against the public administration.

3.32. RELATIONS WITH INTERESTED PARTIES

Enel attaches strategic importance to dialogue with associations for proper business development; for this reason, it establishes a stable channel of communication with the associations representing the interested parties to cooperate respecting reciprocal interests, present Enel's positions and avoid possible conflict situations.

To this end, Enel:

Guarantees a response to comments from all associations;

Where possible, focus on informing and engaging relevant associations on issues that affect specific classes of stakeholders.

3.33. CONTRIBUTIONS AND SPONSORSHIPS

The Enel Group in Colombia, together with other group companies, has set up a non-profit association – Fundación Enel Colombia- whose objective is to intervene in the social and non-profit field, respecting the role and ethics of each which. Fundación Enel Colombia pursues exclusive purposes of social solidarity towards disadvantaged subjects, making special reference to people with disabilities, the sick, children and the elderly. It is the main tool of the Enel group in these areas. Through the tools offered by the current legal system (for example, donations, sponsorship activities or stipulating specific conventions), Enel supports initiatives that may affect social, environmental, sports, entertainment and art issues, of scientific and technological dissemination. In particular, sponsorship activities must offer a guarantee of quality and may respond to specific territorial requirements (when Enel intends to support initiatives in territories of industrial interest) in close relationship with the active subjects in the affected territorial areas (by way of example , institutions, local entities, entities of the tertiary sector) with which Enel collaborates in the design.

In any case, when choosing proposals to adhere to, Enel pays special attention to each possible personal or business conflict of interest (for example, family relationships with the affected subjects or relationships with organizations that may, for example, the tasks they carry out, favor Enel's activity in some way).

The management of donations and sponsorship activities is organized by specific internal procedures to also guarantee consistency, transparency with the applicable regulations and compliance with them.

3.34. ANTITRUST AND REGULATORY BODIES

Enel fully and rigorously complies with antitrust rules and respects market regulatory bodies. Enel does not deny, hide, manipulate the information requested by the antitrust authority and by other regulatory bodies in their respective functions, nor does it provide it late and actively collaborates during investigation procedures.

3.35. AUTHORITY FOR THE PROTECTION OF PERSONAL DATA

Enel collaborates with the leading authorities in matters of privacy through the data protection delegate, in charge of contacting and managing investigation procedures, as provided for by the group's policies and by the regulations on matters of privacy. personal data protection. The data protection officer guarantees compliance with data protection regulations in the countries where Enel operates in contact with its customers.

Modalities of Action

4.1. TASKS OF THE AUDIT COMMITTEE REGARDING THE PERFORMANCE OF THE CODE OF ETHICS

Regarding the Code of Ethics, the following tasks are the responsibility of the Audit Committee: Examine the periodic reports prepared by the head of the Audit Function regarding violations of the Code;

Examine possible modifications or additions to the Code of Ethics to be submitted, with prior examination also by the Good Corporate Governance Committee, for the approval of the Board of Directors.

4.2. TASKS OF THE AUDIT FUNCTION

The following tasks are attributed to the person in charge of the Audit Function:

Check the application and respect of the Code of Ethics through an analysis and evaluation of the internal control system with monitoring of business processes, which have significant impacts on business ethics;

Monitor initiatives to spread knowledge and understanding of the Code of Ethics;

Receive and analyze reports of violations of the Code of Ethics.

Said activities are carried out with the support of the interested Functions of the company, having free access to all the documentation considered useful.

4.3. COMMUNICATION AND TRAINING

Internal and external stakeholders are made aware of the Code of Ethics through specific communication activities (for example, the delivery of a copy of the Code to all people, dedicated sections on the company Intranet and on the website, the introduction of specific clauses in all contracts, etc.). The Innovation, Standards Compliance and People and Organization Functions are assigned the task of promoting the continuous improvement of ethics and initiatives to spread knowledge and understanding of the Code of Ethics. In order to ensure the correct understanding of the Code of Ethics for all Enel people, the People and Organization Function designs and carries out a training plan aimed at promoting knowledge of the principles and ethical standards. The training initiatives are differentiated according to the position and responsibility of the people; A specific training program is contemplated for newly hired employees, which illustrates the contents of the Code that require compliance.

4.4. COMPLAINTS BY THE INTERESTED PARTIES

Enel establishes specific communication channels for each interested party to send their complaints. As an alternative, all of Enel's stakeholders can report each violation or suspected violation of the Code of Ethics² to the Audit Function, which analyzes the complaint, eventually listening to the perpetrator and person responsible for the alleged violation.

4.5. VIOLATIONS OF THE CODE OF ETHICS

The Audit Function communicates the violations of the Code of Ethics discovered as a result of the complaints of the interested parties or the audit activity and the related proposals for corrective actions:

To the Audit Committee and the President of the Board of Directors who evaluate the opportunity to communicate the most important cases to the Board of Directors;

To the corporate bodies of the subsidiaries, directly and indirectly, for matters within their competence.

The measures derived from the verification of the violations are defined by the competent business structures in accordance with the provisions of the applicable national regulations.

SUSTAINABILITY REPORT

Enel and the group companies, bound by regulatory requirements, commit to annually publish a sustainability report in accordance with the best applicable national and international standards, which examines the three dimensions of governance, social and environmental responsibility. The sustainability report offers a clear, truthful and correct summary of the management and the results obtained in all areas of relationship with the interested parties in relation to the principles and commitments made in the Code of Ethics, and the objectives of improvement established periodically, presenting, in the case of extraordinary or exceptional events (change of scope or new acquisitions), specific approaches.

² Reports can be submitted in the following ways: via the web or by calling the toll-free number as indicated on the Enel Code of Ethics web page <https://secure.ethicspoint.eu/domain/media/en/gui/102504/index.html> writing a letter to the address: Enel Colombia – Audit Management- Carrera 13A No. 93-66-Bogotá

TASKS OF THE UNIT IN CHARGE OF SUSTAINABILITY

In terms of ESG responsibility (Environmental, Social and Governance) inspired by the Code of Ethics and defined as the company's commitment to follow a sustainable development model, the unit in charge of sustainability is responsible for the following tasks:

Guarantee the dissemination of sustainability, highlighting the company's commitment to sustainable development and the creation of shared value; in particular, cooperating with the competent functions of the company for its promotion in Enel;

Define the criteria and process for managing sustainability information and the commitment to socially responsible investors (SRI), interact with sustainability analysts and rating agencies, to promote Enel's best practices of a sustainable nature, thus increasing the interest of socially responsible investors towards Enel;

Consolidate, prepare and monitor the country/region sustainability plan, in accordance with the Group Sustainability Plan and the Global Guidelines;

Prepare reports and internal and external communications on sustainability, in accordance with the Global Guidelines; and the sustainability report and related periodic reports;

Involve the stakeholders in the preparation of the materiality matrix³, the identification of the sustainability objectives and the preparation of the sustainability report;

Submit the sustainability report to the evaluation of the Audit Committee;

Cooperate with the different Enel Functions to identify the sustainability objectives aligned with the United Nations 2030 Agenda and the development of derived projects, and collaborate in the formulation of the industrial plan for sustainability aspects;

Propose to the Audit Committee the modifications and additions to be made to the Code of Ethics, in accordance with the business functions affected.

4.8. EXTERNAL CONTROL

Enel submits its own sustainability report to external control by an accredited independent company. Likewise, it participates in national and international activities for the development of standards and criteria regarding sustainability.

³ The materiality matrix (or matrix of priorities) makes it possible to identify and evaluate the priority issues for the stakeholders, and weighted on the basis of their relevance, comparing them with the priorities of the group and with the industrial strategy considering the impacts generated and received.