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# ETHICAL CODE

## 2022

AUGUST, 2022  
VERSION 3

enel

All Enel stakeholders can report violations or suspected violations of the Code of Ethics to the Audit function.

Reports can be submitted in the following ways:

- Through the web or by calling the toll-free number as indicated on the web page of the Code of Ethics: <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

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# 1

## Introduction

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This Code sets out the commitments and responsibilities of an ethical order, in the management of business and business activities, assumed by the people of the companies of the Enel Group in Colombia, and of the companies of the group, including associations, funds and foundations of which Enel is Source of institution<sup>1</sup>, be these administrators, employees or collaborators in all senses of said legal entities.

Enel is committed to creating sustainable value shared with all its parts stakeholders, internal and external, innovating and seeking excellence throughout the supply chain value of the businesses in which it operates.

All this in a manner consistent with the purpose: “**Open Power for a brighter future: we empower sustainable progress**”, which is the mission of the Enel Group in Colombia:

- open energy to more people in the world;
- open energy to new technologies;
- open up to new forms of energy management for all consumers;
- open energy to new uses;
- open the energy to new collaborations.

### PROTECTION OF TRANSPARENT DIALOGUE WITH INTERESTED PARTIES

Enel aspires to maintain and develop a relationship of trust with its stakeholders, it is that is, with those categories of individuals, groups or institutions whose contribution to carry out Enel’s mission or who, in any way, show an interest in your search.

Stakeholders are all those with an interest, direct or indirect, in the activity of the group, such as companies and category associations, customers, the financial community, national and international institutions, civil society and local communities, the media, employees, suppliers, contractors, the organizations and institutions that represent them and the partners, considered natural or legal persons, with an interest in the joint development of new projects.

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<sup>1</sup> Hereinafter, “Enel” will refer to the Companies of the Enel Group in Colombia and all the companies of the group, including associations, funds and foundations of which Enel is a Source of Institution.

## UNETHICAL BEHAVIOR

In the conduct of business, unethical behavior harms the relationship of trust between Enel and its stakeholders. They are unethical and favor behaviors hostile towards the company, the behavior of anyone, individually or in the organization, which tries to appropriate the benefits of collaboration, taking advantage of power positions.

## THE VALUE OF REPUTATION AND FIDUCIARY DUTIES

A good reputation is an essential intangible resource that, externally, favors investments from the financial community, a lasting relationship with clients, the attraction of the best clients, the trust of the suppliers, the reliability towards the creditors and, internally, it is nurtured by a climate of collaboration and a work approach open to including all diversities.

The Code of Ethics clarifies the particular duties of Enel towards the interested parties (duties trustees) and their effective compliance is essential to ensure Enel's reputation.

Therefore, the Code of Ethics is constituted:

- For the **general principles**<sup>2</sup> on relations with interested parties, which define abstractly the reference values in Enel's activities;
- By the criteria of conduct towards each class of interested party, which specifically provide the guidelines and standards that Enel people must respect in order to prevent the risk of unethical behavior;
- By **action mechanisms**, which describe the control system for compliance of the Code of Ethics and for its continuous improvement.

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<sup>2</sup> The general principles are inspired by the Universal Declaration of Human Rights of the United Nations of 1948 and the European Convention on Human Rights of 1950.

## THE VALUE OF RECIPROCITY

This Code is based on an ideal of cooperation focused on mutual advantage of the parties involved, respecting the role of each one. For this reason, Enel demands each interested party act towards the company according to principles and rules, inspired by an idea analogous to ethical conduct.

## VALIDITY AND APPLICATION OF THE CODE

The principles and provisions of this Code of Ethics are intended for the members of the Board of Directors and other control and supervision bodies of the companies of the Enel Group in Colombia and of the other group companies, as well as directors, employees and collaborators who maintain contractual relations with the group in any concept, also occasional and/or only temporary.

Likewise, Enel requires suppliers and partners to adopt a conduct in line with the general principles of this Code. The Code of Ethics is valid in all countries where Enel operates despite the cultural, social and economic diversity of these countries.

# 2

## General principles

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Enel wants to contribute to building a world where energy is at the service of the community to create development, growth and a better quality of life for all. In agreement With the Open Power strategic positioning, Enel has opted for sustainability environmental, social and economic, along with innovation, in its business culture and is implementing a sustainable development system, based on the creation of value, both inside and outside companies. A concrete commitment that helps achieve the United Nations Sustainable Development Goals.

## **2.1. IMPARTIALITY AND NON-DISCRIMINATION**

In relations with the surrounding community and the institutions that represent it, Enel avoid any type of discrimination based on sex, age, disability, sexual orientation, ethnicity, religious beliefs, political ideologies and other forms of diversity.

## **2.2. HONESTY**

Within the framework of their professional activity, Enel people must diligently respect current laws, the Code of Ethics, policies and internal regulations. In no case, the pursuit of Enel's interests may justify dishonest conduct.

## **2.3. CORRECT CONDUCT IN CASE OF POTENTIAL CONFLICTS OF INTEREST<sup>3</sup>**

In carrying out any activity, situations where the subjects involved in the transactions are, or appear to be, in a conflict of interest must be avoided.

This is understood as a real or apparent situation where the secondary interest (economic, financial, family or of another nature) of the person of Enel interferes or tends to interfere with the ability to impartially make decisions in the best interest of the company and fulfill their functions and responsibilities and, likewise, the case in which the representatives of clients, suppliers or public institutions act in their relations with Enel in contrast to the fiduciary duties linked to their positions.

## **2.4. CONFIDENTIALITY**

Enel guarantees the confidentiality of the information it possesses and refrains from searching for reserved data, except in the case of express and conscious authorization and in accordance with current legal regulations. In addition, Enel people must not use confidential information for purposes not related to the exercise of their own activity, such as in the case of abuse of confidential information or market manipulation.

Enel respects the indications contemplated by business policies and by the national and European regulations for the protection of personal data to guarantee full respect for the privacy of all the natural persons with whom it interacts.

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<sup>3</sup> Also consult the Zero Tolerance Plan for Corruption: [//www.enel.com/es/inversores/sostenibilidad/temas-performance-sustainability/basic-principles/zero-corruption-tolerance-plan](http://www.enel.com/es/inversores/sostenibilidad/temas-performance-sustainability/basic-principles/zero-corruption-tolerance-plan)

## **2.5. RELATIONS WITH SHAREHOLDERS**

Enel considers, in accordance with a specific self-interest -in addition to being a duty towards the market- to ensure a constant and open relationship, based on the reciprocal understanding of the positions, with the generality of the shareholders and with the institutional investors, in order to increase the relative level of understanding of the activities carried out by society and the group. Within this framework, Enel maintains a dialogue with investors based on the principles of fairness and transparency, in compliance with community and national discipline regarding market abuse and in line with the best international practices.

## **2.6. CAPITAL INVESTMENT VALORIZATION**

Enel acts so that the economic-financial return safeguards and increases the value of the company, in order to adequately remunerate the risk assumed by the shareholders with the investment of capital from a long-term approach.

## **2.7. VALUE OF PEOPLE**

Enel is committed to its people as an enabling factor to prosper in a world that is undergoing permanent transformation. For this reason, Enel safeguards and increases the value of the people who work in companies, promoting continuous learning and professional development.

In particular, Enel guarantees that its actions do not harm the dignity or autonomy of people and that the choices of work organization protect the value of individuals and the reconciliation between work and private life.

## **2.8. INTEGRITY OF THE PERSON**

Enel guarantees the physical and moral integrity of its people, working conditions that respect personal dignity and individual specificities, and safe and healthy work environments. Likewise, it acts so that episodes of harassment, intimidation, mobbing or stalking do not occur in the work environment. Requests or threats that induce people to act against the law, the Code of Ethics or internal policies, or to adopt behaviors that are detrimental to individual convictions or preferences.



## **2.9. EQUITY**

In the signing and management of contractual relations, which imply entering into labor relations, Enel is committed to guaranteeing fairness and correctness, avoiding abuses of authority.

## **2.10. TRANSPARENT, COMPLETE, CORRECT AND TRUTHFUL INFORMATION**

Enel people must provide complete, transparent, understandable and accurate information so that, when defining relations with the group, the interested parties can make decisions autonomously and aware of the interests at stake, the alternatives and the relevant consequences. In particular, in drafting possible contracts, Enel is responsible for specifying to the contracting party the behaviors that will be applied in all the foreseen circumstances in a clear and understandable way.

## **2.11. DILIGENCE AND PRECISION IN ACTIVITIES AND IN THE EXECUTION OF CONTRACTS**

Contracts and work orders must be consciously executed based on what is established by the parties. Enel undertakes not to take advantage of conditions of ignorance or incapacity of the other parties.

It must be avoided that, in existing relationships, anyone acting in the name and on behalf of Enel tries to take advantage of contractual loopholes or unforeseen events, to renegotiate the contract solely in order to take advantage of the position of dependency or of weakness in which the interlocutor finds himself.

## **2.12. QUALITY OF SERVICES AND PRODUCTS**

Enel directs its activity to satisfy and protect its customers by listening to requests that may favor an improvement in the quality of products and services.

For this reason, Enel focuses its research, development and marketing activities towards high quality standards for its services and products.

## **2.13. FAIR COMPETITION**

Enel intends to protect the value of fair competition by refraining from incurring in collusive, predatory behavior and abuse of a dominant position.

## **2.14. RESPONSIBILITY TOWARDS THE COMMUNITY**

Enel is aware of the influence, even indirect, that its activities may have on individual conditions, on economic and social development and on the general well-being of the community and, likewise, on the importance of social relevance in communities where it operates.

For this reason, Enel wants to conduct its investments in a sustainable way, respecting local and national communities and promoting initiatives of cultural and social value.

## **2.15. ENVIRONMENTAL PROTECTION**

The environment is a primary asset that Enel is committed to safeguarding; To this end, it schedules its activities seeking a balance between economic initiatives and essential environmental requirements, taking into account the rights of future generations.

Therefore, Enel undertakes to improve the environmental and landscape impact of its activities and to prevent risks to populations and the environment, respecting current regulations and also taking into account the development of scientific research and best practices in this stuff.

Enel is committed to guaranteeing clean and accessible energy, promoting the decarbonisation of production, the development of renewable energies and the electrification of consumption.

## **2.16. PROTECTION OF PERSONAL DATA**

Enel adopts high standards of security and management of the personal data of its employees, customers and other interested parties. Enel guarantees respect for the rights of data subjects and adopts policies and operating instructions to improve the security of applications and personal data processing. Privacy by design and by default<sup>4</sup> is part of the digitization processes, as is risk analysis and the protection of sensitive data.

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<sup>4</sup> Privacy by Design refers to the principle of incorporating privacy by designing a business process with the relative computer applications of support, while the privacy by default contemplates that, by predefined setting, the Companies must only process personal data to the extent necessary and sufficient for the intended purposes and for the period strictly necessary for these purposes. Consult also the "European Regulation for the protection of personal data – art.25" and local regulation in Colombia.

# 3

## Conduct Criteria

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### SECTION I.

#### CONDUCT CRITERIA IN RELATIONS WITH SHAREHOLDERS

##### 3.1. CORPORATE GOVERNANCE

Enel's corporate governance system complies with the principles included in the Corporate Governance Code of listed companies to which the company adheres and which is also inspired by the best international practices. The corporate governance system adopted by Enel and the group is essentially focused on the goal of creating value for shareholders in a long-term horizon, being aware of the social relevance of the activities with which the group is compromised and from the derived need to adequately consider all the interests involved in relative development.

##### **Internal control and risk management system**

The internal control and risk management system ("SCIGR") is constituted by the set of rules, procedures and organizational structures, which allow the identification, measurement, management and monitoring of the main business risks within the group setting.

The SCIGR is integrated into the most general organizational and corporate governance structures adopted by the company and by the Enel group and is inspired by the best practices existing at the national and international levels. In particular, said system considers the recommendations of the Corporate Governance Code of listed companies and is defined in accordance with the "Internal Control – Integrated Framework" model issued by the Committee of Sponsoring Organizations of the Treadway Commission (called the "COSO Report"). , which represents the internationally known reference model for the integrated analysis and evaluation of the effectiveness of SCIGR.

An effective SCIGR helps to direct the company in a way that is consistent with the company objectives defined by the Board of Directors, since it allows the main risks to be identified, evaluated, managed and monitored in relation to their ability to influence the scope of the these objectives. In particular, the SCIGR helps to ensure the protection of social assets, the

efficiency and effectiveness of business processes, the reliability of information provided to the corporate bodies and the market, respect for the laws and regulations and, likewise, for the statutes and internal procedures.

### **Audit company**

Enel commissions the audit of the balance sheet for the year and the consolidated balance sheet in a transparent manner and in strict compliance with current regulations. In order to preserve the independence of the auditing companies that work within the scope of the group, a specific procedure has been formalized that regulates the assignments to said companies or to the entities of the related networks by group companies. Since its adoption, then carried out on a purely voluntary basis, this procedure has represented a valid oversight of government in the activity of control and monitoring of the independence of the main auditor of the group by the Board of Directors of Enel. Based on said procedure, the Board of Directors must previously approve the granting by the companies of the group of each additional assignment - that is, that it is not the legal audit of the accounts and for which there are no cases of incompatibility contemplated by the law in favor of the main auditor of the group or entities belonging to the relative network.

With regard to some types of additional assignments, with characteristics considered inappropriate to reduce the independence of the main auditor, it is contemplated that the Board of Directors does not have to express prior approval, but rather receives ex post information on the granting of said tasks. orders.

### **3.2. INFORMATION TO THE MARKET**

Enel acts with full transparency, adopting specific procedures to guarantee the correctness and veracity of corporate communications (balance sheets, periodic reports, issue prospectuses, etc.) and to prevent corporate crimes (such as false communications companies, obstruction to the exercise of the functions of the supervisory authorities, etc.) and market abuses (abuse of confidential information and market manipulation). Likewise, Enel makes available all the necessary information so that investors' decisions can be based on knowledge and understanding of business strategies and management development.

Enel's information to the market is characterized by respect for regulatory provisions and also for understandable language, exhaustiveness, correctness, timeliness and symmetry with respect to all investors. Enel considers in accordance with a specific self-interest and also as a duty towards the market, to engage in an uninterrupted dialogue, based on the reciprocal understanding of the charges, with the generality of shareholders and institutional investors. Enel undertakes to provide adequate information to institutional investors and financial analysts through specific presentations and regular roadshows; with small shareholders, Enel undertakes to ensure (i) homogeneity of information, also by publishing all documents intended for institutional investors on the website; simultaneity with the information provided to institutional investors; (iii) contribution of dynamic tools for communication through the web.

### **3.3. CONTROL OF PRIVILEGED INFORMATION**

Enel adopts specific regulations for the internal management and treatment of confidential information and for the communication abroad of documents and information of a business nature, making special reference to privileged information. Said regulation serves to preserve the confidential nature of the reserved information, guaranteeing, at the same time, that the information to the market regarding business data and information is correct, complete, adequate, timely and non-selective.

Enel has instituted a registry (which it updates regularly) where individuals or legal entities who access privileged information based on work or professional activity or functions performed on behalf of Enel or other group companies are registered, and it has also defined a list of people with access to relevant information. Among other things, these tools serve to make registered subjects aware of the privileged or relevant nature of the information they access, facilitating, at the same time, the development of control activities by the supervisory authority on respect of the regulations contemplated to protect the integrity of the markets. Business exponents, employees and collaborators of Enel are expressly prohibited from presenting behaviors that may cause phenomena of abuse of privileged information and illicit communication thereof and market manipulation. In order to guarantee the maximum transparency for the operations carried out by business exponents, Enel adopts rigorous procedures for the management of confidential information in accordance with current regulations and with the best international practices.

## SECTION II.

### CRITERIA OF CONDUCT IN RELATIONSHIPS WITH ALL OTHER INTERLOCUTORS

#### 3.4. INFORMATION PROCESSING

Enel treats the information of the interested parties fully respecting the confidentiality and privacy of the interested parties.

For this purpose, specific policies and procedures for the protection of information are applied and constantly updated. In particular, Enel:

- Defines an organization for the treatment of information that ensures the correct separation of positions and responsibilities;
- It classifies the information by increasing levels of criticality and adopts the appropriate countermeasures in each of the treatment phases;
- Request third parties, who intervene in the processing of information, to sign confidentiality agreements.

#### 3.5. GIFTS, GIFTS AND BENEFITS

Forms of gift that may be interpreted as something that exceeds normal business or courtesy practices or intended to seek favor treatment in the conduct of any activity related to Enel are not allowed. In particular, it is prohibited to make gifts to Colombian and foreign public officials, auditors, Enel directors, members of the control and supervision bodies or their relatives, which may influence the independence of judgment or lead to the securing of any advantage. Said rule, which does not admit derogations even in those countries where making gifts of value to business partners is common, affects gifts promised or offered and those received; it is specified that a gift is any type of benefit (free participation in congresses, accommodation, promise of a job offer, etc.). In all cases, Enel refrains from incurring in practices that are not permitted by law, by commercial uses or by the ethical codes -if known- of the companies or entities with which it maintains relationships.

Enel's gifts are characterized by being intended to promote the image of the Enel brand. Gifts offered and received must be managed and authorized according to business procedures and properly documented.

### **3.6. OUTSIDE COMMUNICATION**

Enel's communication with its stakeholders (including through the media) is based on respect for the right to information; spreading false or biased news or comments is never allowed.

Each communication activity respects the laws, rules, practices of professional conduct and is carried out with clarity, transparency and timeliness, protecting, among other things, price-sensitive information and industrial secrets.

Any form of pressure or favor treatment by the media is prohibited. All press releases are available on the Internet website [www.enel.com](http://www.enel.com), so that they are fully accessible; the institutional portal Enel offers the activation of online services and also presents a series of thematic channels to delve into topics related to the main activity (environment, ecology, science and geoeconomics of energy resources , etc.) and online exchange and discussion with stakeholders. To ensure that the information is complete and consistent, Enel's relations with the media may only be established under the coordination of the relevant functions according to internal procedures.

Enel participates in conferences, seminars and round tables and allows publications of a technical or scientific, social and economic nature, related to its activities in accordance with the following general rules of conduct:

- Participation in each congress of a limited number of people from Enel; Preventive communication of participation and of the issues addressed to the Communication Function

# CHAPTER I.

## CRITERIA OF CONDUCT IN RELATIONSHIPS WITH ENEL PEOPLE

### 3.7. STAFF SELECTION

The evaluation of the personnel to be hired is carried out based on the correspondence of the profiles of the candidates with those expected and with the business requirements in compliance with equal opportunities for all forms of diversity. The information requested is strictly linked to the verification of the aspects contemplated by the professional profile and psychological aptitude, respecting the private sphere and the opinions of the candidate. Within the limits of the information available, the People and Organization Function adopts appropriate measures to avoid discrimination, nepotism or forms of patronage during the selection and hiring phases.

### 3.8. CONSTITUCIÓN DE LA RELACIÓN LABORAL

The staff is hired through a legal employment contract; Illegal forms of work are not tolerated. During the constitution of the employment relationship, each collaborator receives precise information on:

- Characteristics of the position and the tasks to be carried out;
- Regulatory and remunerative elements, as regulated in the national collective bargaining agreement;
- Rules and procedures to adopt to avoid possible health risks associated with work activity.
- Said information is presented to the collaborator in such a way that the acceptance of the assignment is based on an effective understanding.



### **3.9. PEOPLE MANAGEMENT**

Enel guarantees equal opportunities and the absence of discrimination in the management of people, valuing the unique contribution of each one. In the field of processes management and development of people (for example, in the case of promotion, transfer) and as in the selection phase, the decisions made are based on the correspondence between the expected profiles and the profiles possessed and/or on considerations about the merits (for example, allocation of incentives based on the results achieved). Access to positions and responsibilities is also established considering skills and abilities and, likewise, compatible with organizational requirements, these forms of flexibility are favored in the organization of work, which facilitate parental management and care and of family assistance. The evaluation of people is carried out in a broad way involving those responsible, the People and Organization Function and, when possible, the subjects who have had a relationship with the person evaluated. Within the limits of the information available and the protection of privacy, the People and Organization Function acts to prevent favouritism.

#### **Dissemination of personnel policies**

Personnel management policies are made available to everyone in companies through business communication tools (Intranet, corporate web TV, web radio, documents and organizational communications).

#### **Appreciation of people and continuous learning**

Those responsible fully use and value all the professional skills present in the organization by activating the available springs to favor the development and growth of people. In this area, special importance is given to the exchange of feedback between all people to promote the continuous improvement of skills. Enel makes available to all people tools to share knowledge and training activities, face-to-face and remote, to offer continuous and constant learning of social and technical skills in order to increase professional value, respecting personal aptitudes, but also the development of new skills to face new frameworks. In fact, for Enel, "training" is a continuous stimulus to self-learning of the skills and knowledge necessary to respond to the different skills/professional capacities present in the group and in constant evolution.

Enel supports the individual capacity to undertake a training path that respects their own needs, passions and aptitudes and helps people to develop their potential, which changes between individuals, placing the empowerment of people at the top of its strategy development of the people in the group. To this end, Enel promotes, together with technical-operational training, experiential learning activities and a continuous openness to the outside world according to a principle of osmosis between the company and the university, scientific, institutional and favors collation and exchange with other companies. Also, to facilitate a constant training of skills and an entrepreneurial and proactive spirit, Enel makes available to people an online, accessible and mobile training platform, at a global level where the use of online and face-to-face courses is also recorded.

### **People work time management**

Each person in charge must assess the working time of the collaborators, demanding benefits consistent with the performance of their tasks and with the work organization plans. It constitutes an abuse of the position of authority to request, as an act due to the hierarchical superior, benefits, personal favors or any other behavior that outlines a violation of this Code of Ethics.

### **Involvement of people**

The involvement of people is essential in achieving business objectives and is materialized in active, collaborative participation based on independent judgement. The process of formulating the final decisions addresses the various points of view compatible with business requirements.

### **Accessibility**

Enel is committed to creating inclusive labor frameworks, paying special attention to physical accessibility to the places where work is carried out, to digital accessibility of information, documents and communications and to the specific needs of labor assistance tools.

### **Flexibility and workplaces**

Enel favors flexible modalities of carrying out the labor provision, ensuring equal opportunities for contribution and fairness in the valorization of people based on the results obtained and regardless of the modality of development of the work.

## Wellness

Enel carefully encourages behaviors focused on the integration of working life and is actively committed to favoring professional and organizational well-being, as factors that enable the involvement of people and their innovative potential.

### 3.10. INTERVENTIONS IN THE ORGANIZATION OF WORK

In the case of reorganization of work, the value of people is protected by contemplating, when necessary, training and/or professional requalification actions. For which Enel respects the following criteria:

- The burdens of work reorganizations must be distributed in the most uniform way possible among all people and consistently with the effective and efficient exercise of business activity;
- Different tasks can be assigned to the person with respect to those previously developed, in compliance with regulatory provisions, providing, when the requirement remains, adequate training for the acquisition of new and diverse skills.

### 3.11. SECURITY AND HEALTH

Enel considers the health, safety and psychophysical integrity of people as the most precious asset to protect at all stages of life, at work and at home and during free time, and is committed to developing, consolidating and disseminating a strong security culture throughout its business perimeter. Enel's objective is to guarantee a work environment free of danger to health and safety, to protect its own people, constantly seeking the necessary synergies internally in the group companies and also with suppliers, companies, partners and customers. involved in the activity itself. To this end, a branched internal structure, attentive to the evolution of the reference scenarios and the change derived from the risks, carries out interventions of a technical and organizational nature, based on the following fundamental principles:

- The adoption and performance of the Workers' Health and Safety Management System in accordance with the international standard;
- Assessing all risks to health and safety and taking a systematic approach to eliminating them at source or, where not feasible, minimizing them;

- The adoption of the best technologies and working methods aimed at continuous improvement;
- The adoption of an information and training program for workers.

Likewise, Enel acts for the continuous improvement of the efficiency of business structures and processes that contribute to the continuity of the services provided and to national security, including participation in civil protection events.

### **3.12. PRIVACY PROTECTION**

The privacy of individuals is safeguarded by adopting international standards and the relative modalities of treatment and conservation of personal data are defined with the help of the Data Protection Delegate.

Data respecting company policies and various European and national regulations. When processing personal data, Enel respects all fundamental rights and respects the freedoms and principles recognized by law and, in particular, respect for private and family life, the home and communications, the protection of personal data –nals, freedom of thought, conscience and religion, freedom of expression and information.

Likewise, these standards contemplate the prohibition of communicating/disseminating personal data without the prior permission of the interested party, with the exception of the cases contemplated by law, and establish the rules for the control, by each person, of the norms that protect Privacy.

### **3.13. INTEGRITY AND PROTECTION OF THE PERSON**

Enel promotes the principles of diversity, inclusion and equal opportunities and is committed to creating a work environment where people are treated fairly, guaranteeing the right to work conditions that respect individual dignity.

Enel is committed to protecting the physical and psychological integrity and individuality of each person and opposes any form of behavior that causes discrimination in terms of sex, age, disability, nationality, sexual orientation, ethnicity, religion, political opinion and any other form of individual diversity or that is harmful to the person, their convictions or preferences.

Physical, verbal, visual or psychological harassment that creates a demeaning, hostile, humiliating, intimidating, offensive or unsafe work environment is not tolerated. The work environment is the place where the work activity is carried out.

In particular, sexual harassment and behavior that may disturb individual sensitivities (for example, allusions and explicit comments or proposals) are not tolerated.

Disparities in treatment are not considered discrimination when they are justified or justifiable on the basis of objective criteria.

### **3.14. DUTIES OF PEOPLE**

The person must act with loyalty to respect the obligations signed in the employment contract and everything provided for by the Code of Ethics, ensuring the benefits demanded; and it must denounce, in the specific channels, possible situations that constitute violations.

### **3.15. INFORMATION MANAGEMENT**

The person must know and act in accordance with the provisions of company policies on the subject of information security to guarantee its integrity, confidentiality and availability.

He must write the documents themselves using clear, objective and exhaustive language, allowing possible verifications by colleagues, managers or external subjects authorized to request them.

### **3.16. CONFLICT OF INTERESTS**

Enel people must avoid those real or apparent situations where the secondary interest (economic, financial, family or of another nature) of the person interferes or tends to interfere with the ability to impartially assume decisions in the best interest of the company and fulfill their duties and responsibilities.

As an example and not exhaustive, the following situations may determine a conflict of interest:

- Perform a High Function (Chief Executive Officer, director, head of Function) and have economic interests with suppliers, clients or competitors (possession of shares, professional assignments, etc.) even if it is through family members;
- Dealing with relationships with suppliers, clients or business partners and having interests in their activities (for example, carrying out the work/advice activity) even if it is through a family member or an external subject linked to the person of In the.

The Enel person who considers being involved in a conflict of interest, even an apparent one, must refrain from making decisions in relation to the processes or issues where the conflict manifests itself and communicate it following the modalities contemplated by the business procedures.

### **3.17. USE OF BUSINESS ASSETS**

Each Enel person must act diligently to protect company assets through responsible behavior and in accordance with the operating procedures established to regulate their use, accurately documenting their use.

In particular, each person must:

- Conscientiously and soberly use the goods entrusted to it;
- Avoid inappropriate uses of business assets that may be the cause of damage or reduction of efficiency or in any way contrary to the interest of the company.
- Each person is responsible for the protection of entrusted resources and their duty is to promptly inform the units in charge of possible threats or events harmful to Enel. Enel reserves the right to prevent distorted use of its own assets and infrastructure through the use of accounting, reporting, financial control and risk analysis and prevention systems, with the exception of compliance with all provisions of the applicable laws (privacy law, workers' statutes, etc.).

Regarding computer applications, each person must:

- Strictly adopt everything contemplated by the company's security policies, so as not to impair the functionality and protection of computer systems;
- Do not send email messages with threats and insults, do not resort to disrespectful language, do not express inappropriate comments that may offend the person and/or damage the image of the company;
- Do not browse Internet sites with unseemly and offensive content.

# CHAPTER II.

## CRITERIA OF CONDUCT IN RELATIONS WITH CUSTOMERS

### 3.18. IMPARTIALITY AND NON-DISCRIMINATION

Enel undertakes not to arbitrarily discriminate against its customers.

### 3.19. CONTRACTS AND COMMUNICATIONS WITH CUSTOMERS

Contracts and communications with Enel customers (including advertising messages) are:

- Clear and simple, written in a language as close as possible to that normally used by the interlocutors (for example, for customers in general, avoiding clauses understandable only by experts, indicating prices with VAT, clearly itemizing each expense );
- In accordance with current regulations, without resorting to evasive or incorrect practices (such as, for example, the introduction of degrading practices or clauses towards consumers);
- Complete, so as not to neglect any relevant element for the client's decision;

- Available on company websites on the Internet;
- Accessible, so as not to neglect possible disabilities.

In each case, the objectives and recipients of the communications determine the choice of the most suitable contact channels (receipts, telephone, newspapers, email) for the transmission of content without excessive pressure and insistence, and committing not to use misleading or untrue advertising tools.

Finally, it is Enel's responsibility to timely communicate all information regarding:

- Possible modifications to the contract;
- Possible variations in the economic and technical conditions for the provision of the service and/or the sale of the products; results of checks carried out in compliance with the standards demanded by the control authorities.

### **3.20. BEHAVIOR STYLE OF PEOPLE**

Enel's style of behavior towards customers is based on availability, inclusiveness, respect and courtesy, from the perspective of a highly professional and collaborative relationship. Likewise, Enel undertakes to limit the formalities required of its customers and to adopt simplified, secure and, whenever possible, digitized and free payment procedures.

### **3.21. QUALITY CONTROL AND CUSTOMER SATISFACTION**

Enel undertakes to guarantee adequate quality standards of the services/products offered based on predefined levels, and to periodically monitor the perceived quality.

### **3.22. CUSTOMER INVOLVEMENT**

Enel undertakes to always respond to suggestions and complaints from customers and their protection associations, resorting to appropriate and timely communication systems (for example, customer service - call center, electronic means such as email), paying special attention also to customers with disabilities. Enel is responsible for informing customers of the receipt of their communications and the time required for responses, which must be brief in any case.



As far as possible, Enel undertakes to consult the associations that protect consumers for projects that have a significant impact on customers (provision of receipts, information on tariff options, etc.). To ensure compliance with these standards of behavior, there is an integrated system of control over the styles and procedures that regulate the relationship with customers and their representative associations.

# 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:

- 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 Innovability, 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 Ethics<sup>5</sup> to the Audit Function, which analyzes the complaint, eventually listening to the perpetrator and person responsible for the alleged violation.

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<sup>5</sup> 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

#### **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.

#### **4.6. 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.

#### **4.7. 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 matrix<sup>6</sup>, 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.

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<sup>6</sup> 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.

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