



# HUMAN RIGHTS POLICY

April 2025



All Enel stakeholders may report any violation or suspected violation of the Human Rights Policy in the following ways:

- in written form, that is, through the web, through the reporting system.
- online available at the following orally by telephone, by contacting the numbers to which link;
- It can be accessed through the website; or, at the request of the reporter, through a direct meeting set within a reasonable time, through the channels indicated above.

# 1 ENEL'S COMMITMENT TO RESPECTING HUMAN RIGHTS

Enel aspires to create sustainable value shared with all stakeholders, internal and external, by innovating and pursuing excellence, and by relying on respect for diversity throughout the entire value chain of the business activities in which it operates.

Enel is leading the energy transition by facilitating access to cleaner and more efficient solutions, always being at people's side, helping them to consciously manage energy consumption and actively contributing to a more sustainable lifestyle. In addition, it demonstrates respect and commitment to future generations, protecting the environment and building a sustainable and better future for all, with a long-term vision.

Our story began by promoting energy access to an increasing number of people: then we opened to new technologies, new services, new ways of using energy, new partnership models, involving as much as possible all our stakeholders to create a more sustainable future together. A sustainable strategy and an integrated business model can contribute to the achievement of the United Nations Sustainable Development Goals and balance risks.

A just and inclusive transition is one that leaves no one behind and considers the needs of all stakeholders, with reference to the most vulnerable.

To this end, we commit to:

- proactively consider the needs and priorities of people and society, as this allows for process and product innovation, a key aspect for an increasingly competitive, inclusive and sustainable business model, including through the adoption of principles of circularity, protection of natural capital and biodiversity.
- Promote the participation of key external and internal stakeholders to raise their awareness and develop a constructive dialogue that can make a valuable contribution to the design of solutions to mitigate climate change.

We believe that companies have the potential to have a positive impact on society: therefore, respect for human rights should be considered the cornerstone of pursuing sustainable progress that goes beyond mere respect for current regulations on the matter.

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To this end, we are also committed to purchasing, developing, and using Artificial Intelligence systems to adhere to the principles of respect for human rights, harm prevention, equity, and transparency, with particular attention to issues of inclusion and diversity and the protection of all stakeholders, in particular, those who may belong to vulnerable groups, such as minors, people with disabilities or other groups historically discriminated against or at risk of exclusion.

With this Policy we express our commitment to respect all Human Rights, especially those that are of great relevance to our value chain, in line with everything that arises from the consultation of our stakeholders (internal, companies, suppliers, human rights experts, expert groups, NGOs) carried out in accordance with the criteria listed in the "*UN Global Compact Guide for business: how to develop a Human Rights Policy*".

We undertake to monitor the implementation of this Policy: (i) using a specific *Due Diligence*<sup>1</sup> process; (ii) promoting behaviors in line with a just and inclusive transition and (iii) communicating on the action plans developed to prevent and remedy cases where criticality arises.

This Policy sets out the commitments and responsibilities that all our employees (Enel S.p.A. and the companies controlled by it<sup>2</sup>) assume with regard to Human Rights, with reference to the conduct of business and business activities, as well as to the standards to which we ask our stakeholders to adhere.

## 1.1

### International Framework of Reference

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

- 1. The United Nations (UN) International Bill of Human Rights**
  - a Universal Declaration of Human Rights**
  - b International Covenant on Civil and Political Rights**

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<sup>1</sup> In the context of the Guiding Principles on Business and Human Rights (Principles 17-21), this term refers to a system of continuous management that a company implements taking into account the sector in which it operates, the operational contexts and the size of the company among other things, to ensure that they respect or are not complicit in human rights abuses. This involves "identifying, preventing, mitigating, and reporting" the negative effects that the company could cause.

<sup>2</sup> Below are indicated by "Enel", Enel S.p.A. and all companies controlled by it, directly or indirectly.

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

In addition, the following private sector standards and voluntary initiatives in their most recent editions have been taken into consideration:

- 1. The ten principles of the United Nations Global Compact
- 2. The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- 3. The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- 4. The Guiding Principles on Business and Human Rights: implementing the United Nations “protect, respect, and remedy” framework into practice.
- 5. United Nations Declaration on the Rights of Indigenous Peoples
- 6. ILO Guidelines for a just transition towards environmentally sustainable economies and societies for all.
- 7. United Kingdom Modern Slavery Act, 2015
- 8. Performance standards on Environmental and Social Sustainability of the International Finance Corporation.

## 1.2

### Internal Framework of Reference

The following internal documents are linked to the principles listed in this Policy and support their application:

- 9. Code of Ethics
- 10. Zero Tolerance Plan for Corruption
- 11. Enel “Global Compliance Program”

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- 12.** Organization and Management Model in accordance with Legislative Decree 8 June 2001 no. 231 ("Model 231") and other Global Criminal Risk Prevention Models
- 13.** *Global Framework Agreement* with global union federations
- 14.** Application de la "*General Data Protection Regulation*" (EU regulation 2016/679) del 25/05/2018
- 15.** Health Policy
- 16.** Diversity, Equity, Inclusion and Belonging Policy
- 17.** Global Anti-Harassment Policy
- 18.** Enel Group statement on harassment
- 19.** Digital Accessibility Policy
- 20.** Environmental policy
- 21.** Biodiversity policy
- 22.** Policy Environmental and Social Impact Assessment and Management (ESIA)
- 23.** Policy Whistleblowing

## PRINCIPLES

The principles included in this section consider the relevance that they assume in the scope of our activities and business relationships, as well as the result of the consultation process with the stakeholders.

We are committed to respecting these principles in all the countries in which we operate, considering local cultural, social and economic diversities, requiring each of our stakeholders to adopt conduct in line with these principles, paying particular attention to high-risk or conflict-affected contexts.

The term interest groups refers to all those who have a direct or indirect interest in the Group's activities, such as customers, employees at all levels, suppliers, contractors, partners, other companies and professional associations, the financial community, civil society, local

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communities, and indigenous and tribal peoples. national and international institutions, the media, as well as the organizations and institutions that represent them.

In particular, in addition to ensuring the necessary quality standards, supplier performance must be accompanied by a commitment to adopt best practices in terms of human rights and working conditions (including appropriate working hours, forced or child labor, respect for personal dignity, non-discrimination and inclusion of diversities, freedom of association and collective bargaining), occupational health and safety, environmental responsibility and respect for privacy *by design and by default*.

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

## 2.1

### Work Practices

#### 2.1.1

##### Rejection of forced or compulsory labor and child labor

We reject the use of any form of forced or compulsory labor<sup>3</sup> and any form of slavery and human trafficking - as defined by ILO Convention No. 29 - nor do we confiscate money or identity documents to hold the worker against his or her will. We consider children and child workers to be a category of risk, so we pay a great deal of attention to respecting their rights throughout the value chain of our activities.

We reject the use of child labor, as defined by the legislation in force in the country in which the activities are carried out. In any case, the age must not be lower than the minimum age set out in ILO Convention No. 138.

#### 2.1.2

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

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<sup>3</sup> Forced or compulsory labor means: any work or service exacted from an individual under the threat of any penalty and for which the individual does not offer himself voluntarily. (See art. 2 para. 1, ILO Convention No. 29).

<sup>4</sup> The term discrimination includes any distinction, whether direct or indirect, respectively: (a) any distinction, exclusion or preference based on race, color, sex, sexual orientation, religion, political opinion, national descent or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment and occupation; (b) any other distinction, exclusion or preference which has

We promote the principles of diversity, inclusion, equal treatment and opportunities, and we are committed to ensuring the right to working conditions that respect the dignity of every person, as well as to creating a work environment in which people are treated fairly and valued for their uniqueness.

We are committed to protecting the physical and psychological integrity and individuality of every person and oppose any form of behavior that causes discrimination on the basis of gender, age, disability, nationality, affective orientation and gender identity, ethnicity, religion, political opinions and any other form of individual diversity or that is harmful to the individual, their convictions or preferences. In the same way, we promote freedom of expression.

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

We are committed to a "fair for all" energy transition, including by offering innovative and inclusive services of a unique nature, with a particular focus on customers in vulnerable and fragile conditions (such as age-related demographics, people in economic difficulty, marginalized), as well as people with disabilities.

We are committed to always responding to suggestions and complaints from customers and the associations that protect them, using appropriate and timely communication systems (e.g. call center services, e-mail addresses), and considering all customer needs, with particular attention to people with disabilities.

### 2.1.3

#### **Freedom of association and collective bargaining**

We protect the right of our employees to form or participate in organizations designed to defend and promote their interests. In the same way, we also respect their right to be represented, within the different production units, by trade union bodies or other forms of representation, elected according to the laws and practices in force in the different countries in which they work.

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the effect of nullifying or altering equality of opportunity or treatment in employment or occupation. (See Art. 1 paragraph 1, ILO Convention No. 111).

We consider collective bargaining to be the preferred instrument for determining the contractual conditions of our employees, as well as for regulating relations between the company's management and trade union organizations.

#### 2.1.4

##### [Health, Safety & Wellbeing](#)

At Enel, we believe that people's health, safety, psychological, relational and physical well-being is the most asset to be protected at every moment of life, both at work and at home and in leisure time.

That is why we are committed to developing and disseminating a strong culture of health, safety and well-being, to ensuring increasingly healthy and safe processes and workspaces for our employees and for all those who work with Enel, as well as to promoting work-life balance-oriented behaviors. We are actively committed to promoting personal and organizational well-being as enablers of people's commitment and innovative potential.

We promote communication, at all levels of the organization, to disseminate the strategic principles for our daily action and consolidate individual awareness and the adoption of responsible behaviors by all.

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

Our commitment also encompasses the integration of health and safety at all levels of the organization and in all processes, in training activities, in the rigorous selection and management of suppliers and contractors, in the exchange of information and in the constant activity of comparative analysis with the outside.

We also engage contractors and our suppliers in development and awareness programs: each person must feel responsible for their own health and safety, and that of others.

#### 2.1.5

##### [Fair and favorable working conditions](#)

Everyone who works with us, throughout the entire value chain, has the right to conditions that respect health, safety, well-being and dignity, the maximum number of working hours, rest periods during the day and during the week and one paid holiday period per year.

The remuneration of the Group's employees shall take into account the principle of fair compensation for work and equal pay for work of equal value between men and women for work of equal value, based on an objective assessment of the work to be performed (ILO Convention No. 100). The minimum wage of the Group's employees may not be lower than that established by the collective agreements and the legislative and regulatory treatments in force in the different Countries, in accordance with all the provisions of the ILO Conventions.

In addition, we also believe that vocational guidance and training are important for the development of people and their skills, in particular in situations affected by the energy transition and where our approach encompasses the principles of circularity, promoting retraining and upskilling of professions through the implementation of specific programs to promote a just transition.

## 2.2

### Community and Society

#### 2.2.1

##### Environment

We consider mitigating climate change and defending natural capital to be among the most difficult challenges in ensuring that people can enjoy their rights.

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 our activities. Added to this is our more general commitment to accelerate the processes linked to decarbonization and electrification to enable the achievement of the objectives of containing global warming in line with the Paris Agreement and contribute to the achievement of the United Nations Sustainable Development Goals.

As a testament to our commitment, the five core principles (together with the 10 strategic objectives) of our [Environmental Policy](#):

1. Protect the environment by assessing risks and preventing impacts.
2. Mitigate environmental degradation and climate change by setting targets for improving processes and environmental performance of assets.
3. To improve and promote the environmental sustainability of products and services.
4. Creating shared value for the Company and stakeholders.
5. To meet legal compliance obligations and voluntary commitments by promoting ambitious environmental management behavior.

The Group's Environmental Policy includes a specific commitment to respect biodiversity.

## 2.2.2

### Respect for the rights of communities

We are aware of the influence, even indirect, that our activities can have on the communities in which we operate: for this reason, responsible relations with communities represent a pillar of our strategy.

Individual conditions, economic and social development and the general well-being of the community are closely linked: for this reason, we want to make our investments in a sustainable way and promote initiatives of cultural, social and economic value, respecting local and national communities, to promote social inclusion through education, training and access to energy.

In addition, we are also committed to ensuring that our products and services are designed in such a way that they are accessible to all and do not compromise the health and physical integrity of our customers, however reasonably foreseeable that may be.

## 2.2.3

### Respect for the rights of local communities

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

In addition, we also collaborate with suppliers, contractors and partners who respect Human Rights and contribute to the socio-economic development of the communities in which we operate.

We also do all this, but not only that, through the promotion of preventive, free and informed consultation activities and social inclusion actions (local workforce, health and safety training, development of local projects, also in partnership with local organizations). In fact, knowledge of specific local needs and constant community listening allows us to implement robust actions even in unpredictable and unprecedented emergency conditions.

In the planning and implementation of infrastructure projects, we undertake to take due account of the appropriate environmental and social impact assessments, of their environmental footprint and of respect for Human Rights in the area where the project is planned.

Taking as a reference the Voluntary Principles on Security and Human Rights, we are committed to ensuring that private security forces working to protect the Group's personnel and property in the areas of activity act in a manner consistent with applicable national laws and international norms and standards.

#### 2.2.4

##### Respect for the rights of Indigenous and tribal peoples<sup>5</sup>

We pay special attention to the most vulnerable communities, such as Indigenous and tribal peoples, and we commit to upholding the United Nations Declaration on the Rights of Indigenous Peoples.

In the development of our projects, we are committed to involving all relevant stakeholders, including Indigenous and tribal communities, because we believe that the active participation of communities in the process is essential.

#### 2.2.5

##### Integrity: zero tolerance for corruption

We adopt an approach based on respect for human rights, aware of the double impact that corruption phenomena have, undermining, on the one hand, the very role of the State as a

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<sup>5</sup> These terms refer respectively to:

- (a) tribal peoples in independent countries, whose social, cultural and economic conditions distinguish them from other sectors of the national community, and who are governed wholly or partly by their own customs or traditions or by special legislation.
- (b) peoples in independent countries, who are considered indigenous by virtue of their descent from populations who inhabited the country or a geographical region to which the country belongs at the time of the conquest or colonization or the establishment of the current State boundaries and who, regardless of their legal status, retain all or part of their own social, economic, cultural and political institutions. (See art. 1 para. 1, ILO Convention No. 169).

sovereign entity that provides for the well-being of its citizens and, on the other, exposing the most disadvantaged and marginalized people in society to the consequences of a malfunctioning of public institutions and greater vulnerability.

It is also for this reason that we combat corruption in all its forms, direct and indirect, as we recognize it as one of the factors that undermine institutions and democracy, ethical values and justice, well-being and the development of societies.

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

## 2.2.6

### Confidentiality and Privacy

We respect the confidentiality and right to privacy of our stakeholders and are committed to the appropriate use of the data and information provided to us by the people who work with us, our clients, and other stakeholders. The protection of personal data is a major challenge for us in the era of digitalization and globalization of markets.

We process personal data in accordance with all fundamental rights and respect the freedoms and principles recognized by law, such as respect for private and family life, home and communications, freedom of thought, conscience and religion, freedom of expression and information.

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

The privacy of individuals is protected by adopting international standards; the modalities of processing and storage of personal data are defined with the support of the Data Protection Office (DPO) in compliance with business policies and procedures and European and national regulations.

We also undertake to require the adoption of the same standards from all third-party companies that may be able to process customers' personal data on our behalf. To this end, specific clauses are provided for in the contracts with partners who use personal data to carry out specific activities, such as sales services or customer satisfaction surveys.

## 2.2.7

### Communication

We are committed to non-discriminatory and culturally friendly institutional and commercial communication while paying particular attention to not negatively influencing the most vulnerable audiences, such as children and the elderly.

In addition, we require that contracts and communications sent to our customers:

- are clear and simple, formulated in a language as close as possible to the language normally used by the interlocutors.
- are compliant with current regulations, without resorting to circumvention or incorrect practices.
- are complete, so as not to neglect any relevant element in the client's decision.
- are available through business websites.
- are accessible, so that no different skills are neglected.

## 3 APPLICATION AND FOLLOW-UP

The implementation and monitoring of the commitments expressed in this Policy are based on appropriate Due Diligence processes.

Enel, in fact, as called for by the United Nations Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development (OECD) Guidance on the Duty of Care for Responsible Business Conduct, has defined a process for assessing the robustness of the human rights management system. The process covers the entire value chain in the different countries in which the Group operates and makes it possible to assess both the level of alignment of processes and procedures with the management requirements of the

United Nations Guiding Principles, as well as the level of integration of respect for the principles contained in this Policy into business practices.

The assessment of perceived risk, in combination with the identification of gaps, makes it possible to define the main human rights issues and to analyze the organizational and control systems for the correct integration of human rights into business practices, identifying areas for improvement.

In particular, the perspectives of stakeholders are considered by identifying the main issues. Due Diligence is carried out in the different countries in which the Group is present, and involves relevant stakeholders and experts from different sectors, including civil society and academic institutions.

Specifically, direct and indirect workers, civil society representatives from local communities and indigenous and tribal peoples, trade unions, local institutions, companies and professional associations and clients are consulted.

Therefore, specific action plans are drawn up for each country of presence and an improvement plan to be managed centrally, to harmonize and integrate processes and policies to be applied at the local level at a global level.

Suppliers are monitored in terms of Human Rights to detect any critical problems in advance and take the corresponding measures.

The dedicated Human Rights Management unit is responsible for integrating the Human Rights Policy into business processes and ensuring the execution of Due Diligence activities.

Local Sustainability Units are responsible for integrating the Human Rights Policy into the country of ownership.

### 3.1

## Complaints from interest groups

The Group's internal and external stakeholders can report<sup>6</sup>, even anonymously, any violation or suspected violation of the Human Rights Policy through a single platform accessible from the Group's website ([link](#)). The platform allows you to submit reports in the following ways:

- in writing, through the web.
- orally, by telephone.
- or, at the request of the complainant, through a direct meeting set within a reasonable time, through the channels indicated above.

The Audit function receives and analyzes complaints in accordance with applicable regulations. Enel assures its own commitment to ensure that no act of retaliation is carried out on the basis of a complaint, understood as any act that may give rise even to the mere suspicion of a form of discrimination or penalization, or to any conduct, act or omission, whether or not imposed or threatened, that causes or may cause unfair harm to the complainant, directly or indirectly. Likewise, the confidentiality of the identity of the whistleblower will be guaranteed, without prejudice against legal obligations.

If, because of a complaint, a violation of the principles contained in this Policy is proven, the same procedure provided for in the Code of Ethics will be activated.

### 3.2

## Human Rights Policy Review

The Committees of the Board of Directors evaluate modifications or integrations of this Human Rights Policy and submit them to the Board of Directors of Enel S.p.A. for approval.

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<sup>6</sup> In line with the third of the United Nations Guiding Principles on Access to Remedy.

## Tasks of the unit in charge of human rights strategy and positioning

The unit in charge of strategy and positioning in the field of Human Rights has the task of:

- to program and coordinate the application of the Due Diligence process, together with the other functions affected, to the extent that they are within their respective competences, complementing the regulatory requirements in the matter.
- disclose Enel's actions in relation to the commitments made in this document to its relevant stakeholders.

## 4 COMMUNICATION AND FORMATION

The Human Rights Policy is brought to the attention of internal and external stakeholders through targeted communication activities. To ensure that it is correctly understood by all Enel employees, a training plan has been developed to promote knowledge of the principles contained therein.

## 5 DEFINITIONS

### Forced or compulsory labor

Any work or service demanded of an individual under the threat of any penalty, and for which said individual does not offer himself voluntarily. (Article 2 para. 1, ILO Convention No. 29).

### Business Relations

Relationships with business partners, companies in the value chain, and even any other state or non-state entity directly related to the company's activities, products, or services. (Principle

13, "The Business Guiding Principles and Human Rights: Operationalizing the United Nations 'Protect, Respect and Remedy' Framework").

## Discrimination

The term encompasses both direct and indirect discrimination, respectively:

- a. any distinction, exclusion or preference based on race, color, sex, affective orientation and gender identity, religion, political opinion, national descent or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment and occupation.
- b. any other distinction, exclusion or preference that has the effect of nullifying or altering equality of opportunity or treatment in matters of employment or occupation. (Article 1 paragraph 1, ILO Convention No. 111).

## Indigenous and tribal peoples

These terms refer respectively to:

- a. peoples in independent countries, considered indigenous by virtue of their descent from populations who inhabited the country or a geographical region to which the country belongs at the time of the conquest or colonization or the establishment of the current State boundaries and who, whatever their legal status, retain all their own social institutions, economic, cultural and political, or part of them;
- b. tribal peoples in independent countries, whose social, cultural and economic conditions distinguish them from other sectors of the national community, and who are governed wholly or partly by their own customs or traditions or according to special laws and regulations. (Article 1 paragraph 1, ILO Convention No. 169).

## *Due Diligence (Debida Diligencia)*

In the context of the Guiding Principles on Business and Human Rights (Principles 17-21), this term refers to a system of continuous management that a company implements taking into account the sector in which it operates, the operational contexts and the size of the company

among other things, to ensure that they respect or are not complicit in human rights abuses. This involves "identifying, preventing, mitigating, and reporting" potential negative effects that could result from the company's activities.

## Partners

Natural or legal people who have an interest in Enel for the joint development of new projects (Enel Group Code of Ethics).