

# Anti-bribery policy of Enel S.p.A.

in accordance with the International Standard ISO 37001:2016



Enel S.p.A. considers as a priority the promotion of a corporate culture inspired by the values of solid and transparent governance and is aware that the phenomenon of corruption represents an obstacle to economic, political and social development and a serious distortion of the rules, correctness and transparency of the markets.

In line with the principles contained in *The Code of Ethics of Enel Group*, in *The Enel Group Zero Corruption Tolerance Plan (ZTC)*, in the *Organization and Management Model as per Legislative Decree No. 231/01*, in the *Enel Global Compliance Program (EGCP)* for foreign subsidiaries and in the *Human Rights Policy*, Enel S.p.A. has voluntarily decided to adopt and implement its own Anti-bribery Management System compliant with the requirements of the ISO 37001:2016 standard, as an effective safeguard in the fight against corruption, as well as for the continuous improvement of its activities and processes.

The behavior and daily activities of Enel people are oriented towards the aforementioned governance safeguards, with the **strategic objective** of preventing and contrasting the onset of any kind of corruption, also in line with *Environmental, Social and Governance (ESG) criteria* and the United Nations sustainable development goals shared by Enel with its membership of the UNGlobal Compact.

Therefore, Enel S.p.A. pursues the maintenance of the following **commitments**:

- to comply with current legislation on the prevention and fight against corruption;
- to prohibit and prosecute any behavior not compliant with this Policy and with the principles of The Code of Ethics, of the Enel Group Zero Corruption Tolerance Plan, of the Organization and Management Model as per Legislative Decree No. 231/01, of the Enel Global Compliance Program, with the application of the company sanctioning system;
- to develop knowledge and awareness on individual obligations, on processes to which each stakeholder takes part and on the risks/opportunities connected to the activities and role assigned;
- to promote the growth and consolidation of an organizational culture on the prevention and fight against corruption;
- to promote a rigorous process for the identification, selection and management of counterparties, disclosing practices and principles of correctness and transparency, also through specific contractual clauses for the adherence of third parties to the ethical principles of a responsible business conduct adopted by the Organization;
- to enhance the effectiveness and efficiency of processes, pursuing continuous improvement, also through the definition of both specific indicators for monitoring the riskier activities and measurable improvement objectives consistent with company policies;
- to monitor the adequacy of its Management System, also to guarantee the compliance with the Organization and Management Model as per Legislative Decree No. 231/01 and its continuous improvement;
- to encourage the reporting of alleged corrupt practices, making the most suitable tools available to internal and external stakeholders to communicate behavior not in line with company policies, protecting the whistleblower from possible retaliation;
- to establish an Anti-bribery Compliance Function, composed by representatives of the Audit, Legal Corporate Regulatory & Antitrust Affairs and HSEQ-Quality Functions, which is guaranteed full authority and independence.

This Policy must be promoted and disseminated to all stakeholders, and it is essential that all colleagues of Enel S.p.A. support its values and principles, actively contributing to the achievement of the objectives set therein. The effectiveness and application of this Policy will be periodically re-evaluated in order to guarantee its correspondence to the strategy of Enel S.p.A. and its suitability to the contexts in which it will operate.

03/05/2024

**The Chief Executive Officer**  
Flavio Cattaneo