



ANTI-CORRUPTION PREVENTION POLICY

Enel Green Power SpA

Enel Green Power SpA supports the **Enel Group's** energy transition strategy by promoting decarbonization and increasing the production of energy from renewable sources. It provides technical guidance and services to support activities related to the development, design, construction, operation, improvement, recovery, transformation, purchase, sale, and decommissioning or conversion of energy generation and storage plants.

In line with the principles set forth in the Code of Ethics, the Zero Tolerance of Corruption Plan (ZTCP), the Organizational and Management Model pursuant to Legislative Decree 231/2001, the Global Compliance Program on Corporate Criminal Liability (EGCP) for foreign subsidiaries, and the Human Rights Policy, **Enel Green Power SpA** has voluntarily decided to adopt and implement its own **Anti-Corruption Management System (SGPC)** in compliance with ISO 37001 requirements. This system serves as an effective safeguard in the fight against corruption and supports the continuous improvement of its activities and processes.

The **SGPC** applies to all activities, operational sites, and corporate functions, as well as to relationships with third parties such as suppliers, consultants, business partners, and other stakeholders.

Enel Green Power SpA has established a dedicated Compliance Function with full autonomy, adequate authority, and operational independence, serving as an essential safeguard to ensure the effective implementation and monitoring of the **Anti-Corruption Management System**.

The **SGPC** involves Compliance Function, functional managers, operational managers, and staff, each with specific responsibilities defined in corporate documents.

Enel Green Power SpA sets measurable objectives for corruption prevention and specific indicators for monitoring high-risk activities, consistent with corporate policy and based on periodic corruption risk assessments.

The organization is committed to pursuing the following general commitments to prevent and combat corruption:

- Ensure an absolute prohibition of behaviors that may constitute acts of corruption or attempted corruption;



- Guarantee full compliance with applicable anti-corruption laws and regulations;
- Address any behavior that does not comply with this Policy and the principles of adopted ethical documents, applying the corporate disciplinary system;
- Promote reporting by internal and external stakeholders of possible violations or behaviors inconsistent with the Policy through secure and confidential channels, ensuring protection against retaliation;
- Monitor the adequacy of the **SGPC**, also to ensure compliance with the Organizational and Management Model pursuant to Legislative Decree 231/2001;
- Continuously raise awareness and train personnel on anti-corruption issues, fostering the development of an organizational culture on these topics.

This Policy must be promoted and made accessible to all stakeholders. Every employee is required to share its values and principles, contributing responsibly and diligently to achieving corporate objectives in compliance with the Code of Ethics.

The Policy and its implementation are subject to periodic reviews to ensure consistency with corporate strategy and effectiveness.

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