



## ANTI-BRIBERY POLICY

### Enel Green Power SpA

**Enel Green Power SpA** supports the Enel Group's energy transition strategy by promoting decarbonization and increased energy generation from renewable sources. It provides technical guidance and services supporting the development, design, construction, operation, improvement, refurbishment, conversion, acquisition, sale, decommissioning or repurposing of energy generation and storage facilities.

Consistent with the **principles** set out in the Code of Ethics, the Zero Tolerance of Corruption Plan (ZTC Plan), the Organization and Management Model pursuant to Italian Legislative Decree No. 231/2001, the Enel Global Compliance Program (EGCP) for foreign subsidiaries, and the Human Rights Policy, Enel Green Power SpA has voluntarily decided to adopt and implement its own **Anti-Bribery Management System** (ABMS) in accordance with the requirements of ISO 37001, as an effective control framework for combating bribery and for the continual improvement of its activities and processes.

The ABMS applies to all activities, operating sites and corporate functions, as well as to relationships with third parties such as suppliers, consultants, business partners and other interested parties.

Enel Green Power SpA has established a dedicated Anti-Bribery Compliance Function, with full autonomy, appropriate authority and operational independence, as an essential oversight function to ensure the effective implementation and monitoring of the Anti-Bribery Management System.

The Anti-Bribery Compliance Function, functional managers, operational managers and personnel are involved in the ABMS, each with specific responsibilities defined in the organization's documented information.

Enel Green Power SpA establishes measurable anti-bribery objectives and specific indicators for monitoring higher-risk activities, consistent with the company policy and the outcomes of the periodic bribery risk assessment, ensuring that such objectives and indicators are monitored, reviewed and, where necessary, updated.

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

- Strictly prohibit any conduct that constitutes, or could amount to, an act or attempted act of bribery;
- Ensure full compliance with applicable anti-bribery laws and regulations;
- Promptly identify, disclose, assess and manage any actual or potential conflicts of interest that could compromise the impartiality, integrity or transparency of the organization's decision-making processes;
- Take appropriate action against any conduct that does not comply with this Policy or with the principles of the adopted ethics and compliance documents, including application of the company disciplinary system;
- Encourage internal and external interested parties to report possible violations or conduct inconsistent with this Policy through secure and confidential reporting channels, ensuring protection from retaliation;
- Monitor the suitability, adequacy and effectiveness of the ABMS, including to support compliance under the Organization and Management Model pursuant to Italian Legislative Decree No. 231/2001;



- Continuously raise awareness and provide training to personnel on bribery prevention, fostering an anti-bribery culture founded on integrity, transparency, accountability, legality and zero tolerance for all forms of bribery.

This Policy shall be promoted and made accessible to all relevant internal and external interested parties. Every person working for or on behalf of the organization is expected to uphold its values and principles and to contribute responsibly and diligently to the achievement of the company's objectives, in compliance with the Code of Ethics.

The Policy and its implementation are subject to periodic review to ensure continued alignment with the company strategy, the effectiveness of the ABMS, and the controlled incorporation of any organizational, legal, regulatory, procedural or contextual changes relevant to bribery prevention.

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**Salvatore Bernabei**

Sole Director of Enel Green Power SpA