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Enel Supplier Code of Conduct
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Purpose and scope



Purpose and scope

In line with the Group's strategic positioning, Enel has placed environmental, social and economic sustainability at the core of its corporate culture and is implementing a sustainable development system based on the sharing of value creation, both within and outside the company.

In order to achieve these challenging objectives, Enel considers it essential to establish and maintain over time relationships with partners who share the same values and principles and the same strategic vision of the role of Sustainability.

This Code of Conduct therefore sets out the expected standard behaviors for suppliers with the aim of preventing the occurrence of negative impacts on human rights, labor rights and the environment along the supply chains.

In line with the provisions of the Sustainable Procurement Policy, this Code of Conduct applies to all Enel direct suppliers, as well as to the entire supply chain, including subcontractors, sub-suppliers and third parties involved in the procurement of goods, works and services.





Enel Sustainability Commitment

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Enel Sustainability Commitment

Enel adopts an integrated approach to sustainable value creation, placing stakeholders, including communities and the territories in which the Group operates.

In this context, Enel promotes a fair and inclusive energy transition, fostering social, economic and environmental development and maintaining continuous dialogue with local communities. Environmental, social and governance sustainability constitutes a fundamental pillar of Enel's business model and guides the Group's strategic decisions across the entire value chain. Enel is committed to creating sustainable and shared value by integrating the management of ESG (Environmental, Social and Governance) impacts, risks and opportunities into its decision-making and operational processes.

Regarding environmental sustainability, the Group continues its path toward the reduction of direct and indirect greenhouse gas emissions, in line with the Paris Agreement and the 1.5°C scenario, as certified by the Science Based Targets initiative (SBTi), and confirms its objective of achieving net zero emissions across all Scopes by 2040. Along this path, the Group will continue to safeguard the socioeconomic fabric through its Just Transition plan. In parallel with these commitments, Enel states its strong commitment to the protection of

natural capital, environmental protection and biodiversity conservation, placing them among its strategic priorities. This commitment is reflected throughout the entire value chain and in all industrial activities.

The Enel Environmental Policy formalizes these principles, ensuring compliance with regulatory requirements in the Countries where it operates and defining voluntary commitments and targets on relevant environmental issues. It provides guidance for the management of impacts, risks and opportunities related to climate, biodiversity, water resources, waste and pollution.

In this context, Enel recognizes the centrality of respect for human rights as an essential element for sustainable development. Through its Human Rights Policy, the Enel Group has made a public commitment to operate responsibly, preventing, mitigating and, where necessary, remedying negative impacts on people's rights. This commitment is undertaken in line with the main international reference standards, including the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Responsible Business Conduct, and is integrated with the ethical and governance tools already adopted by the Group, thereby strengthening their scope.



The Human Rights Policy strengthens and expands the commitments already included in other ethical documents adopted by Enel, such as the Code of Ethics and the “Zero Tolerance for Corruption” Plan. In addition, the Italian companies of the Group are equipped with an organizational and management model pursuant to Legislative Decree No. 231 of 8 June 2001 for the prevention of risks relating to corporate administrative liability for criminal offences. Regarding the prevention of offences relating to corporate criminal liability for foreign companies, the Enel Global Compliance Program is in place¹.

The current context of the energy and digital transition implies an evolution in the ways in which works are carried out and goods and services are supplied, making suppliers key players in achieving the Group’s sustainability objectives. Enel therefore promotes a collaborative approach aimed at improving the economic, social and environmental performance of the supply chain through processes focused on the efficient use of resources, technological innovation and proper waste management, as well as the prevention of pollution and the reduction of energy consumption and greenhouse gas emissions.



¹ In April 2025, the Enel Group updated, with the approval of the Board of Directors, the Code of Ethics, the “Zero Tolerance for Corruption” Plan, the Enel Global Compliance Program and the Human Rights Policy. The 231 models of the Group’s Italian companies are subject to updating in light of regulatory, interpretative or corporate organizational changes.



Suppliers Conduct Guidelines

Suppliers Conduct Guidelines

Enel suppliers are contractually required to comply with binding requirements relating to environmental sustainability, social responsibility, protection of human rights, occupational health and safety, and integrity.

Also in accordance with the General Terms and Conditions of Contract, the Health, Safety and Environment Provisions and the specific contractual commitments undertaken, including those relating to the prohibition of forced labor and the obligation to oversee and control their own supply chain.

Any violation of such obligations entails the activation of remedial measures proportionate to the severity of

the breach, up to the suspension of qualification and termination of the contract.

These requirements form part of a broader supply chain sustainability governance system, consistent with Enel's strategic positioning and aimed at promoting responsible practices throughout the entire procurement cycle. In this context, this Code of Conduct summarizes and clarifies the standards of behaviors expected from Enel contractors and suppliers ("Suppliers").

The principles of the Code of Conduct aimed at promoting the sustainability of the supply chain are set out below.



Suppliers Conduct
Guidelines

031
Environmental

Environmental Area

Principles 7,8,9 UN Global Compact



- European Sustainability Reporting Standard - **ESRS E1 - Climate Change**
- European Sustainability Reporting Standard - **ESRS E2 - Pollution**
- European Sustainability Reporting Standard - **ESRS E3 - Water and marine resources**
- European Sustainability Reporting Standard - **ESRS E4 - Biodiversity and ecosystems**
- European Sustainability Reporting Standard - **ESRS E5 - Resource use and circular economy**

Environmental protection is a strategic priority for Enel and is governed by the Group Environmental Policy, which defines commitments relating to impact prevention, protection of natural resources, fighting climate change and regulatory compliance.

Suppliers, as key actors along the value chain, are required to contribute to the achievement of these objectives, in compliance with applicable provisions, including the environmental components of the Health, Safety and Environment Provisions.

Consistently with the Group Environmental Policy, Enel requires suppliers to be guided by the following fundamental principles:

- 1 Protect the environment, through the analysis, assessment and management of risks with a view to preventing impacts and enhancing opportunities;
- 2 Commit to mitigating the effects of the increasing deterioration of the environment and climate change, considering their social impact;
- 3 Set objectives to ensure and measure actions aimed at avoiding, mitigating or reducing the impact on terrestrial and aquatic ecosystems, making available the necessary resources and updating objectives with a view to the continuous improvement of processes and performance;

4 Improve and promote the environmental sustainability of products and services;

5 Comply with regulatory obligations and voluntary commitments, ensuring that operational activities are carried out in accordance with the legislative and regulatory frameworks of the different countries.

In line with these principles, Enel suppliers are required to adopt conduct aimed at:

– Promoting and implementing actions to reduce and monitor energy consumption and greenhouse gas emissions along their value chain;

– Committing to minimizing their environmental impacts and optimizing the use of energy and natural resources;

– Prioritizing renewable or low environmental impact energy sources;

– Selecting certified sustainable packaging for their supplies;

– Maximizing the recovery of waste and scrap produced, promoting recycling and reuse systems;

– Actively contributing to the protection of natural ecosystems, biodiversity and water resources, preventing the overexploitation of natural resources, promoting ecosystem restoration, and halting any contribution to deforestation, degradation and/or conversion of forests;

– Adopting a waste management system to manage waste responsibly, with particular attention to hazardous waste, in order to prevent and minimize pollution, in compliance with applicable regulations.

Suppliers Conduct Guidelines



Social Area

Principles 1,2,3,4,5,6 UN
Global Compact



- European Sustainability Reporting Standard – **ESRS S1 – Own workforce**
- European Sustainability Reporting Standard – **ESRS S2 – Workers in the value chain**
- European Sustainability Reporting Standard – **ESRS S3 – Affected communities**
- European Sustainability Reporting Standard – **ESRS S4 – Consumers and end-users**

Respect for human rights represents a foundational element of Enel's sustainable development model and is governed by the Human Rights Policy, in line with the main international standards and references, including those

promoted by the United Nations (UN), the International Labour Organization (ILO) and the Organization for Economic Co-operation and Development (OECD). Such commitment is integrated with:

- The Health and Safety Policy;
- The Stop Work Policy, according to which no work may be carried out at the expense of people's health and safety;
- The social and health and safety provisions contained in the Health, Safety and Environment Provisions (Health, Safety and Environmental Terms).

Enel promotes an approach based on the protection of human dignity, safety and well-being throughout the value chain.

Human Rights

Respect for human rights is the foundational element for pursuing sustainable progress.

Enel's business model is based on the creation of sustainable value together with its stakeholders – both internal and external – through continuous innovation, the pursuit of excellence and the integration of human rights throughout the value chain.

This commitment translates into the absolute rejection of practices such as modern slavery, forced labor and human trafficking, and into the promotion of diversity, inclusion, equal opportunities and respect for the dignity of every

individual, both within the Group and in the contexts in which it operates. Enel's approach is inspired by the main international standards in this area: the International Bill of Human Rights, the conventions of the International Labor Organization and the Tripartite Declaration of Principles concerning Multinational Enterprises, which define human rights as applied to business practice. These are complemented by the 10 principles of the United Nations Global Compact, to which Enel has adhered since 2004 as an active member; the United Nations "Protect, Respect and Remedy" framework, set out in the Guiding Principles on Business and Human Rights; and the OECD Guidelines for Multinational Enterprises.



Health and Safety

At Enel, the protection of health, safety and the physical and psychological integrity of people constitute a fundamental value and a priority objective in the performance of business activities.

In line with this commitment, Enel adopts and develops processes, tools and working environments aimed at risk prevention and the continuous improvement of health and safety conditions, for the benefit of its employees and all those working on behalf of or in collaboration with the Company, also through dedicated information and training initiatives.

To make this commitment clear and evident to all Group employees as well as external stakeholders, Enel has developed and disseminated a Health and Safety Policy that describes the guiding principles, strategic objectives, approach, directions and priorities for action aimed at the continuous improvement of health and safety performance.

At Enel, no work may be carried out at the expense of Health and Safety and/or the environment. For this reason, as established by the Stop Work Policy, any risk situation or unsafe behavior will result in the suspension of work and the restoration of Health, Safety and/or environmental conditions.

The above-mentioned documents can be found at the following addresses:

- <https://globalprocurement.enel.com/it/documenti>, in the "Other useful documents" section
-
- <https://globalprocurement.enel.com/it/documenti/documenti-salute-e-sicurezza>

Enel Suppliers therefore acknowledge the Company's commitment to promoting and strengthening a culture of health, safety and environmental protection, and undertake to comply with the same principles and the Health, Safety

and Environment Provisions, where applicable, as well as to ensure that all their Subcontractors, Sub-suppliers, third parties engaged by them and their entire supply chain comply with the same principles and provisions.



Enel is committed to protecting people's rights, including those relating to health and safety, in every country in which it operates, while taking into account local cultural, social and economic differences, requiring that each of its

stakeholders, including Suppliers (Subcontractors, Sub-suppliers, third parties engaged by the Contractor and its entire supply chain), adopts conduct in line with these following principles:

- Rejection of any form of forced or compulsory labor² and any form of slavery and human trafficking – as defined by ILO Convention No. 29 – and child labor;

- Respect for diversity and non-discrimination;

- Freedom of association, collective bargaining and trade union rights. In contexts where national legislation limits their exercise, suppliers are required to ensure alternative forms of independent representation and social dialogue consistent with international standards;

- Health, safety and well-being – ensuring the health, safety and well-being of all workers, ensuring compliance with international, regional and national standards and local regulations;

- Fair and favorable working conditions, paying particular attention to ensuring adequate conditions in terms of wages, working hours and employee benefits;

- Respect for the rights of local communities;

- Respect for the rights of indigenous and tribal peoples, including rights of use, access and ownership of land and natural resources of the legitimate rights holders in the areas in which they operate;

- Respect for the rights of all workers to be paid directly, fully and on time, in accordance with applicable laws, collective agreements and contractual provisions. This requirement includes the obligation to adopt legitimate and traceable payment channels, provide transparent wage documentation and prevent payment delays, improper deductions or non-payment of wages.

- Recognition of the content of the so-called “Ten Principles” of the United Nations Global Compact and management of their activities and business operations in order to meet these fundamental responsibilities relating to human rights, labor, environment and anti-corruption;

- Compliance with the principles set out in ILO Conventions and legal obligations regarding the protection of child labor and women; equal treatment, prohibition of discrimination, abuse and harassment (including physical, verbal, visual and psychological behaviors or acts); freedom of association, organization and representation; adequate conditions and transparency of information regarding wages, working hours, forced labor, safety and environmental protection and sanitary and hygienic conditions.

² Forced or compulsory labor is defined as any work or service exacted from a person under the threat of a penalty and for which that person has not offered themselves voluntarily (see Article 2, paragraph 1, ILO Convention No. 29).

Suppliers Conduct
Guidelines



Governance Area

Principles 10 UN Global Compact



European Sustainability Reporting Standard - **ESRS G1 - Business conduct**

Enel requires its suppliers to adopt the highest standards of integrity, transparency, fairness and legality, in line with the Group Code of Ethics. Such principles are part of a

broader corporate governance and risk prevention system, aimed at ensuring the responsible conduct of activities and the protection of reputation.

In carrying out activities related to contractual relationships with Enel, in line with the provisions of the Group Code of Ethics, Enel requires its suppliers to adopt conduct based on:

- Complying with applicable local, regional, national, European and international laws, regulations and rules, such as, for example, anti-corruption laws and regulations preventing the commission of other types of offences against the Public Administration, regulations on anti-money laundering, assets or other benefits, antitrust regulations, personal data protection laws, etc.;
- Acting with fairness, honesty, transparency and accountability;
- Rejecting and preventing any form of active and/or passive corruption, carried out directly or indirectly, in any context, form or manner, towards public or private entities;
- Ensuring the highest level of transparency about the information necessary for the performance of procurement processes;
- Refraining from any undue interference with decision-making processes relating to qualification procedures, contract awarding or authorization of subcontracting;



- Promptly informing Enel of any conditions or situations of conflict of interest, even if only potential, in order to prevent their occurrence;

- Protecting the personal data of representatives and contacts of the contracting company and of any other party whose data the contracting company is required to share with suppliers, in compliance with privacy regulations;

- Implementing adequate security measures to protect personal data;

- Promptly and fully sharing with the client company any breach of information security involving accidental or unlawful loss, unauthorized disclosure, alteration, destruction or access to personal data transmitted, stored or otherwise processed by the supplier;

- Diligently and seriously respecting the intellectual property rights of the client company and of any other third party, not tolerating the use of counterfeit parts at any level of the production chain.

With the definition of this Code of Conduct, Enel also encourages its suppliers to be guided by the aforementioned principles in the management of their business and in their dealings with third parties.

04

Whistleblowing

Enel has adopted a Whistleblowing channel: the procedures for using the system are governed by the Enel Code of Ethics and by the information document on the conditions, procedures and channels for managing whistleblower reports, available at the following link: <https://www.enel.com/investors/sustainability/strategy-sustainable-progress/sound-governance/basic-principles/code-of-ethics>

In compliance with applicable national and international regulations, Enel invites its Suppliers to make their own reporting channels available to their employees and to the third parties with whom they interact, allowing reports to be submitted also anonymously.

05

Due Diligence

Enel, as required by the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct, has defined a process to assess the strengths of the management system safeguarding human rights.

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, and the level of

integration of respect for the principles contained in the Human Rights Policy within business practices.

Through this process, 100% of the policies and operating procedures adopted are assessed, in order to identify any risks in the management of operations, both direct and indirect, relating to the entire value chain and to the establishment of new business relationships (for example, acquisitions, mergers, joint ventures, etc.). Based on the results obtained, if necessary, an improvement plan is defined.

In this regard, Enel also requires its suppliers to follow similar principles in order to:

- Integrate due diligence into policies and management systems;
- Identify and assess actual and potential adverse impacts on human rights and the environment;
- Prevent and mitigate potential adverse impacts and eliminate (or minimize the extent of) actual adverse impacts, by adopting actions proportionate to the severity and likelihood of the impacts, prioritizing the most severe ones.

Regulatory References and Guiding Principles of the Enel Supplier Code of Conduct

Below are the main laws and regulations considered by Enel as essential and on which relationships with its suppliers must be based. These provisions, referred to in the Code of Conduct, must be known, complied with and communicated.

- Universal Declaration of Human Rights

- ILO Declaration on Fundamental Principles and Rights at Work

- ILO Tripartite declaration of principles concerning multinational enterprises and social policy (ILO MNE Declaration)

- ILO International Labour Standards on Occupational Safety and Health

- ILO Centenary Declaration for the Future of Work

- Rio Declaration on Environment and Development

- 2030 Agenda for Sustainable Development

- UN Global Compact Ten Principles

- UN Guiding Principles on Business and Human Rights

- Women's Empowerment Principles

- Children's Rights and Business Principles

- OECD Guidelines for Multinational Enterprises

- United Nations Convention Against Corruption

- International Covenants on Civil and Political and Economic, Social and Cultural Rights

- ISO 14001

- ISO 26000

- ISO 20400

- ISO 45001

- ISO 30415

- SA8000

- PDR 125

- Regolamento (UE) 2016/679 sulla privacy