

ENEL INNOVATION HUBS ANTI-BRIBERY POLICY PURSUANT TO INTERNATIONAL STANDARD ISO 37001:2016

Enel Innovation Hubs Srl (the Company) is aware that the phenomenon of corruption is an obstacle to economic, political and social development and a heavy distortion of the rules, fairness and transparency of the markets.

Therefore, while carrying out business, the Company guarantees to fully comply with the principles of the “**Code of Ethics**” and the “**Zero Tolerance of Corruption Plan**” of the Enel Group, and of its “Organisational and Management Model pursuant to Italian Legislative Decree No 231/2001”, which, together with the “**Enel Global Compliance Program**” for non-Italian subsidiaries, constitute the pillars of its Anti-bribery Management System.

The Company also undertakes to pursue the general goals and to carry out the consequent actions for **the prevention** and fight against corruption, as indicated below:

- **strict compliance with current legislation on the prevention** and fight against corruption;
- **pursuit of any behaviour that does not comply with the anti-bribery policy**, with application of the corporate penalty system;
- **absolute prohibition** of engaging in behaviour that could be considered corruption or attempted corruption;
- implementation of an **Anti-bribery Management System** as per **ISO 37001:2016** standard, as a defence against corruption and for the continuous improvement of its business;
- presence of a **Compliance Function** for the prevention of corruption, composed of the Head of: the Audit Holding Function, the Head of the Industrial Law and Property Rights Legal Assistance unit of Legal and Corporate Affairs Function and the Head of Quality unit of Health, Safety, Environment and Quality unit of People and Organization Function, to which full authority and independence are guaranteed;
- **encouraging the reporting** of any corrupt action, making the tools available to employees and stakeholders to report behavior that is not in line with the relevant corporate policies and protecting the whistleblowers from any retaliation;
- conducting **scouting and networking activities based on principles of ethics**, integrity and fairness;
- **raising awareness and training** of its employees on issues for preventing the corruption.

SOLE ADMINISTRATOR OF ENEL INNOVATION HUBS SRL
Fabio Tentori