



## **ENEL GLOBAL TRADING S.P.A. ANTI-BRIBERY POLICY**

### **Introduction**

Enel Global Trading S.p.A. considers the phenomenon of corruption as 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 its business, Enel Global Trading S.p.A. undertakes to fully comply with the principles of the Code of Ethics and the Zero Tolerance Corruption Plan of the Enel Group and its own Organization and Management Model pursuant to Legislative Decree No. 231.

In addition, Enel Global Trading S.p.A. has formulated this Anti-Bribery Policy in order to be appropriate to the purposes and context of the organization and to constitute the reference framework for setting the goals for the prevention of corruption, based on the essential principles, commitments and consequent actions listed below.

### **Principles**

- Awareness, at all levels of the organization, of the risk of corruption potentially deriving from its business;
- constant attention to the prevention of corruption;
- responsibility in conduct in compliance with the laws and procedures in force regarding the prevention of corruption.

### **Commitments**

- Continuous assessment of corruption risks and implementation of suitable prevention measures, thus verifying their adequacy and effectiveness and establishing a culture of integrity, transparency and compliance;
- awareness and training of its employees on the issues of preventing corruption to increase awareness of the related risks;
- absolute prohibition of engaging in conduct that could be configured as corruption or attempted corruption;
- encouragement of employees and stakeholders for the purpose of reporting any corruption actions;
- pursuit of any conduct that does not comply with the principles of this Policy for the prevention of corruption, through the application of the corporate sanctioning system.

### **Actions**

- Direct involvement of the Top Management for the development of a solid organizational culture for the prevention of corruption;





- presence of the Anti-Bribery Compliance Function composed of the heads of the Legal and Corporate Affairs, Health, Safety, Environment and Quality (HSEQ) and Global Trading Compliance functions, which are entitled to work with full authority and independence;
- adoption of a systematic approach to risk assessment and its mitigation or elimination, with consequent identification of improvement opportunities;
- rigor in the selection and management of contractors, suppliers and third parties and promotion towards them of the adoption of good corporate procedures for the prevention of corruption;
- promotion of awareness-raising, information and training initiatives for all people involved in the activities of Enel Global Trading S.p.A., in order to develop knowledge and awareness of individual obligations, the processes in which each stakeholder takes part, risks/opportunities related to roles and activities, as well as the measures provided for the prevention of corruption;
- implementation, adoption, monitoring and continuous improvement of an Anti-Bribery Management System in compliance with the international reference standards and continuous evaluation of the internal and external factors that can influence it;
- availability to employees and stakeholders of adequate tools to report conduct that is not in line with the relevant corporate policies, thus protecting the whistleblowers from any retaliation;
- application of the corporate sanctioning system in the event of any conduct that does not comply with this Anti-Bribery Policy;
- constant attention to the communities and to all those who work and/or come into contact with the activities of Enel Global Trading S.p.A., through the sharing of a culture of prevention of corruption, in order to adapt the Enel Global Trading S.p.A. Anti-Bribery Management System according to the relevant expectations.

In accordance with the Enel Group 's codes of conduct that guide the behaviour of the Group companies to the principles of Business Sustainability, Enel Global Trading S.p.A. considers its Anti-Bribery Management System an essential stimulus for the continuous improvement of the organization's reputation, promoting trust in relationships with interested parties.

This Anti-Bribery Policy is communicated and available to all interested parties of Enel Global Trading S.p.A., in the consciousness that everyone's contribution is crucial for achieving the goals and maintaining the company at the highest levels of social responsibility.

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Sole Director of Enel Global Trading S.p.A.

Mr. Claudio Machetti

