

HUMAN RIGHTS POLICY

November 2025



The stakeholders of Enel Americas S.A. may report any violation or suspected violation of the Human Rights Policy through the following channels:

- in writing, through the website, using the online reporting system available at the following [link](#);
- by phone, at the numbers available on the same website;
- or, at the informant's request, via a face-to-face meeting scheduled within a reasonable timeframe, using the channels indicated above.

1 ENEL AMERICAS S.A.'S COMMITMENT TO RESPECTING HUMAN RIGHTS

Enel Americas S.A. focuses on creating sustainable shared value with all its stakeholders, both inside and outside the company, innovating and pursuing excellence while leveraging respect for diversity throughout the value chain in the areas in which it operates.

Enel leads the energy transition by facilitating access to cleaner, more efficient solutions, always prioritizing people's best interests, helping them consciously manage their energy consumption, and actively contributing to a more sustainable lifestyle. Furthermore, it demonstrates respect for and commitment to future generations by protecting the environment and building a sustainable and better future for all through its long-term vision.

Our journey began by promoting access to energy for an ever-expanding population; we have since embraced new technologies, services, ways of using energy, and partnership models, involving our stakeholders as much as possible to jointly create a more sustainable future.

Our sustainable strategy and integrated business model enable us to contribute to the United Nations Sustainable Development Goals while balancing risks.

A fair and inclusive transition leaves no one behind and takes into account the needs of all stakeholders, particularly the most vulnerable. To this end:

- We take a proactive stance in considering the needs and priorities of people and society at large, because this drives innovation in our processes and products. This innovation is key to a competitive, inclusive, and sustainable business model, while also taking into account the adoption of circularity principles, the protection of natural capital, and biodiversity;
- We promote the participation of key internal and external stakeholders to raise awareness and foster constructive dialogue, providing valuable input for developing solutions to mitigate climate change.

We believe that companies can have a positive impact on society. Respect for Human Rights is fundamental to promoting sustainable progress beyond mere compliance with current regulations.

To this end, we also undertake to acquire, develop, and use Artificial Intelligence systems in adherence to the principles of respect for human rights, harm prevention, fairness, and transparency, with particular attention to issues related to inclusion and diversity and the protection of all stakeholders, particularly those belonging to vulnerable populations, such as children and adolescents, persons with disabilities, senior citizens, and other groups that have historically faced discrimination or are at risk of exclusion. Through this Policy, we express our commitment to respecting all Human Rights, and specifically those most closely connected to our value chain. This is in line with findings from consultations with our stakeholders (internal stakeholders, companies, suppliers, human rights experts, think tanks, NGOs, etc.), conducted in accordance with the United Nations Global Compact Guide for Business: How to Develop a Human Rights Policy.

We undertake to monitor the implementation of this Policy through a) a specific due diligence process¹; b) the promotion of practices aligned with a fair and inclusive transition; and c) reporting on evidence of action plans developed to prevent and remedy situations where critical issues are identified.

This Policy establishes the commitment and responsibilities of all individuals working for our company (Enel Americas S.A. and its subsidiaries) regarding Human Rights, particularly those applicable to our business activities and industrial operations, as well as the standards our stakeholders are expected to meet.

1.1 International Benchmarks

This Policy supports the following key values of international and European law and applies their fundamental principles:

1. The United Nations (UN) International Bill of Human Rights:
 - a) Universal Declaration of Human Rights.
 - b) International Covenant on Civil and Political Rights.
 - c) International Covenant on Economic, Social and Cultural Rights.
2. The fundamental conventions of the International Labor Organization (ILO) — No. 29, 87, 98, 100, 105, 111, 138, and 182 — and the Declaration on Fundamental Principles and Rights at Work.
3. United Nations Convention on the Rights of the Child.
4. ILO Conventions No. 107 and 169 on the rights of indigenous and tribal peoples.
5. European Convention on Human Rights.

In addition, the latest versions of the following private-sector standards and voluntary initiatives were used as a reference:

1. The 10 Principles of the United Nations Global Compact.
2. The OECD Guidelines for Multinational Enterprises.
3. The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
4. The United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework.
5. United Nations Declaration on the Rights of Indigenous Peoples.
6. ILO Guidelines for a Just Transition towards Environmentally Sustainable Economies and Societies for All.
7. UK Modern Slavery Act 2015.
8. Environmental and Social Sustainability Performance Standard.
9. General Data Protection Regulation (EU Regulation 2016/679), dated May 25, 2018.

1.2 Corporate References

The following corporate documents of the Enel Group or Enel Americas S.A. are related to and support the principles established in this Policy:

1. Code of Ethics.
2. Zero Tolerance Plan for Corruption.

¹ Within the context of the Guiding Principles on Business and Human Rights (Principles 17–21), this term refers to an ongoing management system that a company implements taking into account, among other things, the sector in which it operates, its operating contexts, and the size of the company, in order to ensure that it respects human rights and is not complicit in human rights abuses. This includes “identifying, preventing, mitigating, and reporting” the adverse impacts that the company may cause.

3. Enel Global Compliance Program.
4. Organization and Management Model pursuant to Legislative Decree No. 231 of June 8, 2001 ("Model 231") and other global corporate models for the prevention of criminal risks.
5. Global Framework Agreement with Global Trade Union Federations.
6. Policy No. 344 – Application of the General Data Protection Regulation (EU Regulation 2016/679) dated May 25, 2018 within the Enel Group.
7. Policy No. 347 – Data Protection Breach Management.
8. Health and Safety Policy.
9. Diversity, Equity, Inclusion and Belonging Policy.
10. Anti-Harassment Policy.
11. Enel Statement against Harassment.
12. Digital Accessibility Policy.
13. Environmental Policy.
14. Biodiversity Policy.
15. Environmental and Social Impact Assessment and Management (ESIA) Policy.
16. Whistleblowing Policy.

2 PRINCIPLES

We have selected the following principles based on their relevance to our activities and business relations, as well as on the outcome of the stakeholder consultation process mentioned above.

We undertake to respect these principles and require each stakeholder to engage with us in accordance therewith, with particular attention to conflict-affected areas and high-risk contexts.

Stakeholders are defined as all those who have a direct or indirect interest in Enel Americas S.A.'s business, including customers; people who work for and with the company, both executives and employees; suppliers; contractors; partners; other companies and business associations; the financial community; civil society; local communities; Indigenous Peoples and tribal communities; national and international institutions; the media; and the organizations and institutions that represent them.

In particular, in addition to ensuring the necessary quality standards, suppliers are required to adopt best practices regarding human rights and working conditions (including appropriate working hours, the prohibition of forced and child labor, respect for personal dignity, non-discrimination and diversity and inclusion, freedom of association and collective bargaining), occupational health and safety, environmental responsibility, and respect for data protection by design and by default.

Through our commitment, we aspire to sustainable progress, making our company and the communities in which we operate more prosperous, inclusive, and resilient, ultimately leaving no one behind.

2.1 Employment Practices

2.1.1 Rejection of Forced or Compulsory Labor and Child Labor

We reject the use of any form of forced or compulsory labor² and any form of slavery and human trafficking, as defined by ILO Convention No. 29. We do not confiscate money or identity documents in order to retain workers against their will.

We consider children and underage workers to be among the groups most likely to be affected; therefore, we take the utmost care to respect their rights in all activities related to the value chain.

We reject the use of child labor. The minimum age of workers is defined by the legislation in force in the country where the activities are carried out and, in no case, may it be lower than the minimum age established by ILO Convention No. 138.

2.1.2 Respect for Diversity and Non-Discrimination³

We promote the principles of diversity, inclusion, and equal treatment and opportunities. We are committed to ensuring the right to working conditions that respect personal dignity, as well as to creating a work environment where people are treated fairly and valued for their individuality.

We are committed to protecting the physical and psychological safety and individuality of every person. We oppose any form of behavior that is discriminatory on the basis of gender, age, disability status, nationality, sexual orientation and gender identity, ethnicity, religion, political opinions, or any other form of individual diversity, or that is detrimental to a person, their convictions, or their preferences. Accordingly, we promote freedom of expression.

We do not tolerate physical, verbal, visual, sexual, or psychological harassment that results in a degrading, hostile, humiliating, intimidating, offensive, or unsafe work environment.

We are committed to an energy transition that is “fair for all.” This includes offering unique, innovative, and inclusive services, paying particular attention to customers in vulnerable and fragile situations (such as demographic groups based on age, people experiencing economic hardship, and marginalized groups), as well as persons with disabilities.

We are committed to always responding to suggestions and complaints from customers and consumer associations through appropriate and timely communication channels (i.e., call centers and e-mail), and to considering the needs of all our customers, particularly persons with disabilities.

² Forced or compulsory labor is understood as: “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself [or herself] voluntarily.” (See Article 2, paragraph 1. ILO Convention No. 29.)

³ The term discrimination encompasses any distinction, whether direct or indirect, namely: a) any distinction, exclusion, or preference based on race, color, sex, sexual orientation, religion, political opinion, national extraction, or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; and b) any other distinction, exclusion, or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. (See Article 1, paragraph 1. ILO Convention No. 111.)

2.1.3 Freedom of Association and Collective Bargaining

We protect the right of the people who work with us to form or join organizations established to defend and promote their interests. Likewise, we respect their right to be represented, within the various work units, by trade unions or other forms of representation elected in accordance with the laws and practices in force in the different countries where we operate.

We believe that collective bargaining is the preferred instrument for determining the contractual conditions of the people who work with us and for regulating relations between company management and trade unions.

2.1.4 Health, Safety and Well-being

We consider the health, safety, and psychological, relational, and physical well-being of people to be the most valuable asset. Therefore, it must be protected at all times, at work, at home, and during leisure time.

For this reason, we are committed to developing and promoting a sound culture of health, safety, and well-being; ensuring increasingly healthy and safer work processes and workplaces for our employees and everyone who works with Enel; and promoting behaviors that support work-life balance. We are actively committed to fostering personal and organizational well-being as factors that facilitate people's engagement and innovative potential.

We promote communication at all levels of the organization to disseminate the strategic principles that guide our daily actions and to strengthen individual awareness and the adoption of responsible behaviors across the organization.

We promote consultation with and participation of workers and their representatives as a key tool for maximizing health and safety protection.

Our commitment also encompasses the integration of health and safety across all levels of the organization and its processes, including training activities, the rigorous selection and management of suppliers and contractors, information exchange, and ongoing external benchmarking.

We also involve our contractors and suppliers in development and awareness-raising programs; every individual must feel accountable for their own health and safety, as well as for the health and safety of others.

2.1.5 Fair and Favorable Working Conditions

All individuals who work with us throughout the value chain are entitled to conditions that respect their health, safety, well-being, and dignity, including limits on working hours, daily and weekly rest periods, and an annual period of paid leave.

The remuneration of our employees is based on principles of fair compensation and respect for equal pay for men and women performing the same work (ILO Convention No. 100). Minimum compensation may not be lower than the minimum wage established in collective bargaining agreements and applicable legislation, in accordance with the provisions of ILO conventions.

We also believe in the importance of career guidance and professional training for the development of the people who work in the company and their skills, particularly in situations affected by the energy transition and that encourage us to adopt a circularity approach that translates into reskilling and enhancing existing potential through reskilling and upskilling programs to foster a fair transition.

2.2 Community and Society

2.2.1 Environment

We believe that mitigating climate change and safeguarding natural capital are among the biggest challenges to ensuring that people can exercise their rights.

The protection of the environment and natural resources, climate action, and the contribution to sustainable economic development are strategic factors in the planning, performance, and development of our operations. This is combined with our broader commitment to accelerating decarbonization and electrification processes to enable the containment of global warming in accordance with the Paris Agreement, while also moving toward the achievement of the United Nations Sustainable Development Goals.

Our commitment is underpinned by the five key principles (together with the 10 strategic objectives) of our Environmental Policy:

1. Protect the environment by assessing risks and preventing impact.
2. Mitigate environmental degradation and climate change by setting targets to improve asset processes and environmental performance.
3. Enhance and promote the environmental sustainability of products and services.
4. Create shared value for the company and its stakeholders.
5. Adopt and fulfill voluntary commitments to promote ambitious environmental management practices.

The Group's Environmental Policy also includes a specific commitment to respecting biodiversity.

2.2.2 Respect for Community Rights

We are aware that our activities may have a direct or indirect impact on the communities where we operate; therefore, responsible community relations are a key pillar of our strategy.

Individual circumstances, economic and social development, and the overall well-being of the community are closely interconnected. Therefore, we are committed to making our investments sustainable and promoting cultural, social, and economic initiatives in the local and national communities involved, in order to advance social inclusion through education, training, and access to energy.

We are also committed to ensuring that our products and services are designed to be accessible to all and do not compromise the safety or physical integrity of our customers, to the extent reasonably foreseeable.

2.2.3 Respect for the Rights of Local Communities

We are committed to respecting the rights of local communities and contributing to their economic and social development.

Likewise, we align ourselves with suppliers, contractors, and partners that respect Human Rights and contribute to the socioeconomic development of the communities where we operate.

This includes, but is not limited to, promoting free, prior, and informed consultation activities and implementing social inclusion measures (local employment, health and safety training, and the development of local projects, including in partnership with local organizations). In fact, our knowledge of specific local requirements and continuous engagement with the needs of communities allow us to develop robust actions, including in the event of unprecedented and unforeseen emergencies.

More specifically, in the design and construction of infrastructure projects, we are committed to taking into due account, through appropriate environmental and social impact assessments, our environmental footprint and respect for Human Rights in the areas where the projects will be developed.

With reference to the Voluntary Principles on Security and Human Rights, we require that any private security forces protecting the company's personnel and assets in the areas where we operate act in the same manner and in compliance with applicable national laws, regulations, and international standards.

2.2.4 Respect for the Rights of Indigenous and Tribal Communities⁴

We pay special attention to the most vulnerable communities, such as Indigenous Peoples and tribal communities, and we are committed to respecting the United Nations Declaration on the Rights of Indigenous Peoples.

When developing our projects, we are committed to involving all relevant stakeholders, including Indigenous and tribal communities, because we believe active community participation throughout the process is essential.

2.2.5 Integrity: Zero Tolerance for Corruption

We adopt an approach based on respect for human rights, aware of the dual impact of corruption, which, on the one hand, undermines the role of the State as a sovereign entity responsible for the well-being of its citizens and, on the other, exposes the most disadvantaged and marginalized people in society to the consequences of dysfunctional public institutions and increased vulnerability.

For this reason, we also combat corruption in all its forms, both direct and indirect, recognizing it as a factor undermining institutions, democracy, ethical values, justice, and the well-being and development of societies.

We adopt organizational models and systems for preventing and mitigating corruption risks that are integrated into and supported by the "Zero Tolerance Plan against Corruption," one of the key pillars of our Anti-Corruption Control System.

2.2.6 Confidentiality and Privacy

We respect the confidentiality and right to privacy of our stakeholders and are committed to the lawful, proper, and responsible use of the information and personal data of those who work

⁴ These terms refer to:

a) tribal communities in independent countries whose social, cultural, and economic conditions distinguish them from other sectors of the national community, and whose status is governed wholly or partially by their own customs or traditions or by special laws or regulations;

b) communities in independent countries who are regarded as Indigenous on account of their descent from the populations that inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of the present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural, and political institutions. (See Article 1.1 of ILO Convention No. 169.)

in our organization, our customers, and any other stakeholders.

Protecting personal data during processing is a significant challenge for us in the era of digitalization and market globalization.

We recognize that the protection of personal data is a fundamental right recognized in international instruments and in the Chilean Constitution and, as such, we implement technical, organizational, and regulatory measures to ensure that such data are processed appropriately. The principles of “Privacy by Design” (data protection incorporated from the design phase of a business initiative) and “Privacy by Default” (automatically applying configurations that respect end users’ privacy) are an integral part of our management and digitalization processes, as well as of the risk analysis of processing activities.

Personal data is protected by adopting international standards; the methods for processing and retaining such data are defined with the support of the Data Protection Officer (DPO), in compliance with corporate policies and procedures and European and national regulations.

We are also committed to requiring that all third-party companies that may process the personal data of customers or our employees on our behalf, as data processors, adopt the same standards. To this end, specific clauses are included in the contracts entered into with such parties.

2.2.7 Communications

We are committed to ensuring that institutional and commercial communications are non-discriminatory and respectful of different cultures, without adversely affecting the most vulnerable audiences, such as children and older adults.

In addition, we require that contracts and communications addressed to our customers: be clear and straightforward, written in language that is as close as possible to the language normally used by the people to whom the message is addressed; comply with applicable statutory requirements, without resorting to evasive or improper practices; be comprehensive and not omit any relevant information that could affect the customer’s decision; be available on our websites; and be accessible and responsive to the needs of persons with disabilities.

3 IMPLEMENTATION AND MONITORING

The implementation and monitoring of the commitments set out in this Policy are based on appropriate Due Diligence processes.

In accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct, Enel has defined a process to assess the robustness of its human rights management system. The process covers the entire value chain in the different countries where the Group operates and makes it possible to assess both the degree to which processes and procedures are aligned with the management requirements of the United Nations Guiding Principles and the extent to which respect for the principles contained in this Policy is integrated into business practices.

The assessment of perceived risk, combined with the identification of potential gaps, allows us to define the main human rights issues and analyze the organizational and control systems to ensure the proper integration of human rights into business practices, identifying potential areas for improvement.

In particular, stakeholder perspectives are considered when identifying the main issues. Due Diligence is carried out in the different countries where the Group has a presence and involves relevant stakeholders and experts from different sectors, including civil society and academic institutions.

Specifically, we consult with direct and indirect workers, representatives of civil society, local communities and Indigenous and tribal communities, trade unions, local institutions, companies and professional associations, and customers.

Accordingly, specific action plans are developed for each country where the Group has a presence, together with an improvement plan to centrally manage these matters, with the aim of harmonizing and integrating, at the global level, processes and policies to be implemented locally.

Suppliers are monitored for Human Rights to identify critical issues early and implement corresponding measures.

The unit dedicated to human rights management is responsible for integrating the Human Rights Policy into business processes and ensuring the implementation of Due Diligence activities.

Local sustainability units are responsible for integrating the Human Rights Policy in their respective countries.

3.1 Stakeholder Complaints

The Group's internal and external stakeholders may report⁵, including anonymously, any violation or suspected violation of the Human Rights Policy through a single platform accessible from the Group's website (link). This platform allows reports to be submitted in the following ways:

- in writing, through the website;
- orally, by phone;
- or, at the informant's request, via a face-to-face meeting scheduled within a reasonable timeframe, using the channels indicated above.

The Audit department receives and analyzes reports in accordance with applicable regulations. Enel is committed to ensuring that no act of retaliation is carried out on the basis of a report, understood as any act that may give rise even to the mere suspicion of any form of discrimination or penalty, or to any conduct, act, or omission, whether imposed or threatened, that causes or may cause unjust harm to the reporter, directly or indirectly. Likewise, the confidentiality of the informant's identity shall be guaranteed, without prejudice to legal obligations.

If, as a result of a report, a violation of the principles contained in this Policy is established, the same procedure provided for in the Code of Ethics shall be activated.

⁵ In accordance with the United Nations Guiding Principle No. 3 concerning access to remedy.

3.2 Review of the Human Rights Policy

Internal committees evaluate any amendments or additions to the current Human Rights Policy and submit them for approval by the Board of Directors of Enel Americas S.A.

3.3 Responsibilities of the Human Rights Strategy and Positioning Unit

The unit responsible for Human Rights strategy and positioning is tasked with:

- planning and coordinating the implementation of the Due Diligence process, jointly with the other relevant functions, to the extent that such matters fall within their respective areas of responsibility, complementing the applicable regulatory requirements;
- communicating Enel's actions regarding the commitments undertaken in this document to its relevant stakeholders.

4 COMMUNICATION AND TRAINING

The Human Rights Policy shall be disseminated among internal and external stakeholders through specific communication initiatives. Training initiatives shall be carried out to ensure that all Enel employees properly understand the Policy.

5 DEFINITIONS

Forced and Compulsory Labor

Any work or service that is required of any person under the threat of any penalty and for which that person has not offered themselves voluntarily (See Article 2, paragraph 1, ILO Convention No. 29).

Business Relations

Relationships with business partners and companies in the value chain, as well as with any other governmental or non-governmental entity directly linked to the company's operations, products, or services (Principle 13, United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework).

Discrimination

The term discrimination includes direct and indirect discrimination, respectively:

- a) any distinction, exclusion, or preference based on race, color, sex, age, sexual orientation and gender identity, religion, political opinion, national extraction, or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation;
- b) any other distinction, exclusion, or preference that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation (See Article 1, paragraph 1, ILO Convention No. 111).

Indigenous and Tribal Communities

These two terms refer, respectively, to:

- a) communities in independent countries who are regarded as Indigenous on account of their descent from the populations that inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of the present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural, and political institutions;
- b) tribal communities in independent countries whose social, cultural, and economic conditions distinguish them from other sectors of the national community, and whose status is governed wholly or partially by their own customs or traditions or by special laws or regulations (See Art. 1.1, ILO Convention No. 169).

Due Diligence

Within the context of the United Nations Guiding Principles on Business and Human Rights (Principles 17–21), the term human rights due diligence refers to an ongoing management system that a company implements in accordance with the industry in which it operates, its operating environments, the size of the company, and other factors, in order to ensure that it respects human rights and is not complicit in human rights abuses. This includes “identifying, preventing, mitigating, and accounting for” potential adverse impacts generated by the company.

Partner

Any individual or legal entity that has an interest in Enel in connection with the joint development of new projects (Enel Code of Ethics).