



**Policy no. 27**

Version no. 2 dated 22/11/2024

**Subject:** Diversity, Equity, Inclusion and Belonging

**Application Areas**

Perimeter: *Global*

Staff Function: *People and Organization*

Service Function: -

Business Line: -

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**CONTENTS**

1. DOCUMENT AIMS .....	2
2. POLICY APPLICATION AREA.....	2
3. DOCUMENT VERSION MANAGEMENT .....	2
4. UNITS IN CHARGE OF THE DOCUMENT.....	2
5. DEIB STRATEGIC FRAMEWORK: VISION, MISSION, GENERAL PRINCIPLES AND IMPLEMENTATION GUIDELINES .....	3
6. GOVERNANCE AND CONTINUOUS IMPROVEMENT .....	4
7. DIMENSIONS AND PRIORITIES.....	5
8. INFORMATION, TRAINING AND COMMUNICATION .....	6
9. WHISTLEBLOWING AND DISCIPLINARY SYSTEM .....	6
10. DATA CULTURE AND SUSTAINABILITY DISCLOSURE.....	6
11. REFERENCES .....	6
12. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY .....	7
13. DEFINITIONS AND ACRONYMS .....	7

THE HEAD OF PEOPLE AND ORGANIZATION  
**Elisabetta COLACCHIA**

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**1. DOCUMENT AIMS**

This policy sets the strategic and organizational framework to guide Enel's initiatives and projects in matters of diversity, equity, inclusion, and belonging (DEIB).

**2. POLICY APPLICATION AREA**

This Policy shall be implemented and applied to the maximum extent possible within Enel<sup>1</sup> and in compliance with all applicable laws, regulations, and governance standards (i.e.: ISO 30415:2021 – Human Resources Management – Diversity, Equity and Inclusion), including any stock exchange and unbundling-relevant provisions, which in any case prevail over the provisions contained in this document.

The policy should also serve as a reference for the standards that stakeholders connected to our value chain should abide by.

**3. DOCUMENT VERSION MANAGEMENT**

Version	Date	Main changes description
1	21/09/2015	Issuing of the Policy
2	22/11/2024	Introduce strategic changes that incorporate a human-to human and data-driven approach, requiring the integration of the DEIB perspective into key processes and reviewing the DEIB priority dimensions. Strengthen the DEIB governance model by highlighting full management engagement, specific roles of the Holding and Country units, the spread of responsibilities at all levels in daily actions and behaviors and the importance of continuous improvement and other relevant profiles

**4. UNITS IN CHARGE OF THE DOCUMENT**

Responsible for drawing up the document:

- People and Organization / P&O Governance, Strategy and Transformation / People Global Transformation

Responsible for authorizing the document:

- People & Organization / P&O Governance, Strategy and Transformation / Governance and P&O Organization

<sup>1</sup> Below "Enel" refers to Enel SpA and all its direct and indirect subsidiaries.

**Subject:** Diversity, Equity, Inclusion and Belonging**Application Areas**Perimeter: *Global*Staff Function: *People and Organization*

Service Function: -

Business Line: -

---

## 5. DEIB STRATEGIC FRAMEWORK: VISION, MISSION, GENERAL PRINCIPLES AND IMPLEMENTATION GUIDELINES

### 5.1 VISION

DEIB policies are a crucial part of the Enel Group's integrated employee professional lifecycle strategy, grounded in the effective deployment of corporate values and focused on Human-to-Human approach. The goal is to create measurable and tangible value in achieving Enel Group's vision and industrial mission, through the continuous improvement of technologies and process and the enhancement of each individual's human potential in their uniqueness.

### 5.2 MISSION

The Enel Group's DEIB mission is to foster and tangibly drive the continuous improvement of global corporate environments and decision-making processes, starting with those related to people management to assure that every individual is treated equitably based on merit, added value, results, commitment, skills, and behaviors, and feels free, serene, and capable of expressing their full potential, confident of being part of an organizational and relational system they can rely on.

### 5.3 GENERAL PRINCIPLE AND IMPLEMENTATION GUIDELINES

An inclusive, equitable, and respectful environment based on merit generates added value, improves trust in relationships, facilitates creativity and innovation, enhances the effectiveness and efficiency of business processes, boosts the ability to proactively and flexibly address future change challenges, and increases the global attractiveness of our professional environments and the sense of belonging.

To successfully ensure the overarching principle of DEIB, the following minimum set of implementation guidelines should be adhered to:

#### 1. **Cultivate an Inclusive Culture**

This involves fostering an open and safe work environment at all levels of the organization that promotes a bias-free culture, encompassing behaviors and language

#### 2. **Ensure Fair Treatment and Opportunities**

This involve guaranteeing equitable treatment, access, and opportunities for all individuals and actively work to identify and dismantle barriers that impede full participation in corporate life, especially for some groups of people

#### 3. **Promote Respectful Relations**

This involve fostering a reassuring work environment characterized by mutual respect, where all team members feel valued and empowered to contribute their best efforts. This will enhance trust and collaboration across the organization

#### 4. **Recognize Merit-Based Contributions**

This involves generating added value for the organization by acknowledging employee contributions, achievements, and behaviors in alignment with a merit-based approach and organizational values

**Application Areas**

Perimeter: *Global*

Staff Function: *People and Organization*

Service Function: -

Business Line: -

**5. Encourage Open Expression**

This involves facilitating an environment that supports free expression, encourages creativity and innovation, leading to more effective corporate and business processes and enhancing the organization's ability to respond proactively and flexibly respond to future challenges

**6. Advance DEIB Accountability**

This involves promoting and sustaining DEIB policies, ensuring accountability at both the individual and organizational levels and making measurable progress toward DEIB objectives and key performance indicators (KPIs)

**7. Give consistency to DEIB**

This involves the need to integrate DEIB into process and to orient them to DEIB through a continuous improvement approach, starting with those that guide work-life balance and impact the professional life cycle of people and some groups of people

**8. Initiate Dedicated Projects**

This involves implementing and deploying targeted projects and initiatives aligned with DEIB dimensions, address the genuine needs of personnel, and reflect the corporate's priorities and goals

**9. Maintain Open Channels for Feedback**

This involves staying receptive to feedback by conducting and participate surveys, interviews and other initiatives designed to gather relevant information and data for continuous improvement efforts

**10. Boost the DEIB**

This involves corporate commitment among the company's external stakeholders, including trade unions and public opinion, to achieve insights, endorsements, requirements, certifications, and references to best practices

Following these guidelines, involves the organizational capacity, as well as the ability of individuals and corporate stakeholders to guide Enel Group toward data and purpose driven models increasingly oriented towards the human dimension of a life cycle journey committed to the global energy transition for a better world.

**6. GOVERNANCE AND CONTINUOUS IMPROVEMENT**

Continuous management engagement, clear and conscious responsibility spread at all levels regarding everyday behaviors, and continuous improvement of key internal processes according to a DEIB perspective are the three pillars of governance.

To ensure the unity of Enel Group's directives on DEIB, the relevant P&O Holding Units lead the continuous improvement of DEIB strategy, guidelines, and policies, and oversee the entire DEIB process end-to-end, gathering needs and requirements at a global level and monitoring, overseeing and checking the progress and alignment of DEIB projects and initiatives, implemented and deployed by Country Units at local levels.

The governance is focused on continuous improvement that relies on constant listening (e.g. global surveys), as well as Employee Resource Groups (ERG) activities and engagement with other external stakeholders.

**Subject:** Diversity, Equity, Inclusion and Belonging**Application Areas**Perimeter: *Global*Staff Function: *People and Organization*

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Business Line: -

---

Any internal and external allyship and dialogue between different values, ideas, behavioral patterns, and experiences are welcome.

Furthermore, DEIB governance can be strengthened in line with opportunities to achieve national or international certification on DEIB or related topics (e.g., Gender Equality). To ensure the unity of the Enel Group's directives on DEIB, these choices are made in coordination with holding company.

All initiatives and measures to promote DEIB and its principles will be implemented in full compliance with applicable national privacy laws and regulations, under the accountability of the Countries Unit. The integration of the DEIB commitment will also be assessed through the broader Group Human Rights due diligence process.

## **7. DIMENSIONS AND PRIORITIES**

The following dimensions set the priority for related actions and decisions on DEIB and are established to successfully ensure commitment at all levels to the general principles and implementation guidelines of DEIB, as well as to foster Enel Corporate Values of Trust, Innovation, Proactivity, Flexibility and Respect

### **7.1 Parenthood and Caregiving**

Policies, projects, and initiatives on parenting and caregiving are aimed to support employees in their roles as parents, before, during, and after the birth of their child, as well as throughout their child's growth. They also support employees in their roles as care giver for elderly parents. Shared parenting and caregiving programs improve work productivity, work-life balance, and a sense of belonging.

### **7.2 Generations**

Policies, projects, and initiatives focused on generations aim to promote value creation and improve attraction by addressing their specific needs. Intergenerational respect, dialogue, and exchange ensure the enhancement of lifelong learning paths and professional evolution.

### **7.3 Gender and pay equity**

Policies, projects, and initiatives focused on gender and pay equity aim to promote merit, transparency, and inclusion, ensuring equal opportunities and greater female representation in the workforce. Addressing gender imbalances, also due to factors like the low representation of female students in STEM, gender stereotypes, and work-family balance, presents an opportunity to improve development and management processes for people.

### **7.4 Cultural Integration**

Policies, projects, and initiatives focused on cultural integration aim to promote the inclusion of values, knowledge, and social norms with a view to harmonizing corporate behaviors and relations. Cultural integration facilitates the overcoming of barriers derived from the diversity of ethnicities, traditions, beliefs, and people's experiences, as well as of biases and stereotypes, and spreads opportunities for the creation of value within and among global professional families, business and countries.

### **7.5 People with different abilities, neurodivergent conditions, vulnerabilities**

Policies, projects, and initiatives focused on people with different abilities, neurodivergent conditions or vulnerabilities aim to recognize the potential from diverse perspectives and needs brought by individuals. The inclusion of people with different abilities or neurodivergent conditions enables the full participation and contribution of everyone to the corporate life in pursuing the Group's mission. This is ensured by providing

**Application Areas**Perimeter: *Global*Staff Function: *People and Organization*

Service Function: -

Business Line: -

---

accessible workplaces and processes, digital tools and aids based on universal design principles, as well as constant listening and support guaranteed at the country level.

### **7.6 Affective orientation and gender identity**

Policies, projects, and initiatives focused on affective orientation and gender identity aim to build a workplace free of stereotypes, discrimination, bullying, and harassment, both verbal and non-verbal, and to promote the use of inclusive and respectful language and behaviors. Ensuring neutral development and management processes guarantees full recognition of talents and the value of people

## **8. INFORMATION, TRAINING AND COMMUNICATION**

DEIB policies are the subject of specific internal and external information, training, and communication initiatives. Communicating commitments and the results achieved over time stimulates continuous improvement and supports corporate reputation, a sense of belonging, and attractiveness.

## **9. WHISTLEBLOWING AND DISCIPLINARY SYSTEM**

Enel applies the principles of 'zero tolerance' regarding any confirmed violations due to behaviors or the use of inappropriate or otherwise harmful language towards diversity, equity, inclusion, and belonging policies.

Those who believe a violation of DEIB policy might have occurred may resort to the whistleblowing channel, adopted in compliance with the Whistleblower protection legal framework and Policy No. 18, also aligned with the third pillar of the United Nations Guiding Principles on Business and Human Rights, and specified in both Enel's Human Rights Policy and Code of Ethics.

Confirmed violations may lead to disciplinary actions of a contractual nature and are measured in accordance with the principles of gradualness and proportionality, the subjectivity of the conduct, and the presence of aggravating or mitigating circumstances or conditions related to the specific situations in which the violation occurred.

In the most severe cases, disciplinary actions may result in the termination of the contractual relationship. The disciplinary system is applied in compliance with the legal and contractual provisions on employment in force at Country level.

## **10. DATA CULTURE AND SUSTAINABILITY DISCLOSURE**

An essential part of Enel's DEIB activity is dedicated to transforming specific organizational phenomena into numbers and global trends, constantly monitored. The strategic action plan implementation is driven by this evidence and data approach. The data driven approach is adopted to identify, whenever possible, valuable actions to guide corporate strategic choices. All qualitative and quantitative information on DEIB must be managed in full compliance with national applicable privacy laws and regulations.

People and Organization defines targets and KPIs on diversity, equity and inclusion issues at Country and Group Level with the support of Sustainability to be included in the Group Sustainability Plan properly reflected in the Sustainability disclosure.

## **11. REFERENCES**

Group Pillar References

**Policy no. 27**

Version no. 2 dated 22/11/2024

**Subject:** Diversity, Equity, Inclusion and Belonging

**Application Areas**

Perimeter: *Global*  
 Staff Function: *People and Organization*  
 Service Function: -  
 Business Line: -

- [Code of Ethics of Enel Group](#)
- [Enel Zero Corruption Tolerance Plan \(ZTC\)](#)
- [Human Rights Policy](#)
- [Organization and Management Model as per Legislative Decree No. 231/2001](#)
- [Enel Global Compliance Program \(EGCP\)](#)
- [Charter of the Person](#)
- Group Sustainability Plan
- [Organizational Procedure N. 777 External Recruiting](#)
- [Organizational Procedure N. 1814 Succession Plan Process](#)
- Policy N. 18 [Whistleblowing Policy](#);
- [Enel Statement against harassment](#);
- Policy N. 179 [Health and Wellbeing Policy](#);
- Policy N. 431 Workplace Harassment Policy;
- [Public Accessibility Statement](#);
- Policy N. 1142 [Digital Accessibility](#);
- OC N. 355 Comitato Guida sulla Parità di Genere

This Policy supports the following treaties of International and European Law and applies their founding principles:

- The UN Global Compact principles
- The 2030 Agenda for Sustainable Development
- Women’s Empowerment Principles
- The UN Convention on the Rights of Persons with Disabilities
- The International Bill of Human Rights of the United Nations (UN):
  - a. Universal Declaration of Human Rights
  - b. International Covenant on Civil and Political Rights
  - c. International Covenant on Economic, Social and Cultural Rights
- The European Convention on Human Rights
- The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy
- The ILO Convention N. 100 Convention concerning Equal Remuneration for Men and Women Workers for Work of Equal Value
- The ILO Convention N. 111 Convention concerning Discrimination in Respect of Employment and Occupation
- The ILO Convention N. 190 on Violence and Harassment
- The ISO 30415: 2021 Human Resources Management - Diversity and Inclusion

**12. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY**

Level 1 Process: People and Organization

Level 2 Process: Transformation

**13. DEFINITIONS AND ACRONYMS**

Acronym and Key words	Description
Affective Orientation	the pattern of emotional and romantic attraction an individual feels towards others, encompassing aspects of sexual and emotional relationships



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Business Line: -

Acronym and Key words	Description
Belonging	The feeling of being accepted and comfortable in a particular group, environment, or setting, where one feels included, valued, and connected to others
Caregiver	Someone who takes care of another person
Caring	Set of activities, actions or behaviors that show compassion, support, and a willingness to help and nurture those in need
DEIB	Diversity, Equity, Inclusion, Belonging
Discrimination	Absence of equal opportunity and treatment, carried out as a result of a judgment or classification
Diversity	The range of human differences, including but not limited to race, ethnicity, gender, gender identity, affective orientation, age, physical ability or attributes, religious or ethical values system, national origin and any other personal or social characteristic.
Equity	The fair and just treatment of all individuals, ensuring that everyone has access to the same opportunities
ERG	Employee Resource Group represents a workplace affinity group organized around a shared interest or identity, recognized by Enel and following this Policy guidelines
Gender Identity	The personal sense of one's own gender
Harassment	Unwanted behavior or language with the intent or effect of offending, humiliating, or denigrating
Inclusion	The practice of creating environments in which any individual or group can feel welcomed, respected, supported, and valued
Individuality	the characteristics of a person that make the difference from others
ISO 30415:2021 – Human Resources Management	Reference guideline that supports organizations in integrating the principles of valuing diversity and promoting inclusion into their management systems
Neurodiversity	Neurodiversity refers to the different ways a person's brain processes information. The term originated in the social sciences highlights cognitive differences as part of the richness of humanity
People and Organization	People and Organization Enel Function
STEM	Abbreviation for Science, Technology, Engineering, and Mathematics
Stereotypes	A rigid set of beliefs that are socially shared and transmitted about how a person's behavior, role, occupations, traits, and physical appearance should be, based on their gender
Uniqueness	Mix of visible and invisible characteristics of each person
Universal Design Principles	Methodology whose fundamental objective is the conception and realization of spaces, products and services that are in themselves accessible to all is design for human diversity, social inclusion, and equality (EIDD Stockholm Declaration©, 2004)
Values	Key elements of an organization's culture that reinforce its identity, direct the expected behaviors of its resources, and at the same time distinguish it from all other organizations
Well-being	Physical, psychological, and social well-being



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Version no. 2 dated 22/11/2024

**Subject:** Diversity, Equity, Inclusion and Belonging**Application Areas**Perimeter: *Global*Staff Function: *People and Organization*

Service Function: -

Business Line: -

---

Acronym and Key words	Description
Welfare	A set of actions aimed at improving the well-being of workers and their families, complementary to and in addition to public welfare, and consistent with the local Countries context