

Human Rights Policy



Public Joint-Stock Company Enel Russia (herein and after - PJSC “Enel Russia”, Enel Russia, Company) stakeholders believing a violation might have occurred may resort to the following contact channels:

- by e-mail: audit.coe@enel.com;
- by post: Internal Audit Department, PJSC Enel Russia, Russia, Moscow, post code 115093, Pavlovskaya street, building 7, block 1.

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1. PJSC “ENEL RUSSIA” COMMITMENT TO RESPECTING HUMAN RIGHTS

Public Joint Stock Company Enel Russia and its subsidiaries (hereinafter collectively referred to as the “Company”) are focused on creating sustainable value shared with all its internal and external stakeholders, innovating, and pursuing excellence and leveraging the respect of diversity throughout the entire value chain of the businesses in which it operates.

Innovation and sustainability are inseparable parts of the Company’s strategy, together with the spirit of service and care for the well-being of people and the society. The Company is an essential element in the lives of people, businesses, and society at large in the territories and local communities in which it operates.

The Company’s journey started by fostering access to electricity for people; then opened to new technologies, new services, new ways of using energy, new partnership models, engaging all stakeholders as much as possible to create a more sustainable future together.

A sustainable strategy and an integrated business model enable contribution to the United Nations Sustainable Development Goals (SDG) while balancing risks.

The Company have placed SDG 13 “Action to combat climate change” at the center. As a leader in the energy transition, which is a true transformation process, the Company would like to: decarbonize the energy mix and drive the growth of renewable capacity (SDG 7 “Clean and affordable energy”); electrify consumption, empower resilient and efficient infrastructure (SDG 9 “Industry, innovation and infrastructure”) and support development of digital platforms and services (SDG 11 “Sustainable cities and communities”).

A fair and inclusive transition does not leave anyone behind and takes into account the needs of all the stakeholders, and, specifically, the most vulnerable ones. To this end the Company:

- proactively consider the needs and priorities of people and wider society because this leads to process and product innovation which is key for a competitive, inclusive and sustainable business model, including the adoption of circularity principles, protection of natural capital and of biodiversity;
- promote the involvement of the main external and internal stakeholders to enhance awareness and develop a constructive dialogue that can provide a valuable contribution to the creation of solutions that mitigate climate change.

The Company believes that business has the capability to contribute to positive impacts in society: the respect of Human Rights is a fundamental element to empower sustainable progress beyond pure compliance to existing regulations.

Through the Policy hereof the Company commits to respect all Human Rights, and specifically the ones more strictly connected to the value chain, following the outcome of stakeholders consultation (internal stakeholders, companies, suppliers, human rights experts, think tanks, NGOs) held in line with the “UN Global Compact Guide for business: how to develop a Human Rights Policy”.

The Company commits to monitor the implementation of the policy hereof i) through a specific due diligence process, ii) the promotion of practices in line with a just and inclusive transition, and iii) by reporting evidence of action plans developed to prevent and remedy should critical issues occur.

The policy hereof was approved by the Board of Directors of the Company on September 25, 2013, and subsequently amended on December 15, 2021, and sets out the commitment and responsibilities that all the people working in the Company undertake in relation to Human Rights, including those applicable to the business activities and corporate operations, as well as the standards that stakeholders should abide by.

1.1 INTERNATIONAL AND NATIONAL REFERENCES

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

1. The International Bill of Human Rights of the United Nations (UN) comprising:
 - Universal Declaration of Human Rights (adopted by UN General Assembly on 10/12/1948);
 - International Covenant on Civil and Political Rights (adopted by Resolution 2200 (XXI) at the 1496th plenary meeting of the UN General Assembly on 16/12/1966);
 - International Covenant on Economic, Social and Cultural Rights (adopted by Resolution 2200 (XXI) at the 1496th plenary meeting of the UN General Assembly on 16/12/1966).
2. Convention of the International Labor Organization (ILO) n. 29 “On Forced Labor” (adopted at Geneva at the 14th session of ILO General conference on 10/06/1930);
3. Convention of ILO n. 87 “On Freedom of Association and Protection of the Right to Organise” (adopted at San Francisco at the 31th session of ILO General Conference on 09/07/1948);
4. Convention of ILO n. 98 “On Right to Organise and Collective Bargaining” (adopted at Geneva at the 32th session of ILO General Conference on 01/07/1949);
5. Convention of ILO n. 100 “On Equal Remuneration” (concluded in Geneva on 29/06/1951);
6. Convention of ILO n. 105 “On Abolition of Forced Labour” (concluded at Geneva on 25/06/1957);
7. Convention of ILO n. 111 “On Discrimination (Employment and Occupation)” (adopted at Geneva at the 42th session of ILO General Conference on 25/16/1958);
8. Convention of ILO n. 138 “On Minimum Age for employment” (concluded at Geneva on 26/06/1973);
9. Convention of ILO n. 182 “On Worst Forms of Child Labour” (concluded at Geneva on 18/06/1998);
10. The Declaration of ILO on Fundamental Principles and Rights at Work (concluded at Geneva on 17/06/1999);
11. The United Nations Convention on the Rights of the Child (approved by UN General Assembly on 20/11/1989);
12. Convention of ILO n. 107 “On Indigenous and Tribal Populations” (concluded at Geneva on 26/06/1957);
13. Convention of ILO n. 169 “On the Rights of Indigenous and Tribal Peoples” (concluded at Geneva on 27/06/1989);
14. The European Convention on Human Rights (concluded at Rome on 04/11/1950).

The latest versions of the following business standards and voluntary initiatives have also been taken into consideration:

1. The UN Global Compact principles;
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises;
3. The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy;
4. The “UN Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework” ;
5. UN Declaration on Indigenous People;
6. International Finance Corporation Standard no. 5 of ‘Performance standards on Environmental and Social Sustainability’.

In addition, the Policy takes into account the requirements of Russian national legislation in the fields of Human Rights observance, namely:

1. The Constitution of the Russian Federation;
2. Federal Law of 30.04.1999 No. 82-FZ “On guarantees of the rights of the indigenous peoples of the

- Russian Federation”;
3. Federal Law of 12.01.1996 No. 10-FZ “On trade unions, their rights and guarantees of activity”.

1.2 INTERNAL REFERENCES

The following internal documents of the Company are linked to and support the principles set out in this Policy:

1. Code of Ethics;
2. Zero Tolerance of Corruption Plan;
3. Global Compliance Program on Corporate Criminal Liability;
4. Whistleblowing Policy, n. 0276-PL-AUD, November 17, 2017;
5. Anti-Corruption Policy, n. 450, October 09, 2019;
6. Environmental policy, n. 1010 April 13, 2020;
7. Biodiversity policy, n. 1087, November 10, 2020.

2. PRINCIPLES

The Company has selected the principles hereafter based on their relevance to the business activities and relationships, and on the outcome of the stakeholders' consultation process mentioned before.

The Company commits to respect such principles in territories where it operate, with due regard for the cultural, social, and economic diversities of local communities and require that each stakeholder deals with the Company in accordance with them, with a particular attention to conflict affected and high-risk contexts.

Stakeholders refer to any party with a direct or indirect interest in the Company , such as customers, people working in the Company, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them.

Specifically, in addition to guaranteeing the necessary quality standards, suppliers are requested to adopt best practices in terms of human rights and working conditions (including adequate hours worked, forced or child labor, respect for personal dignity, non-discrimination and inclusion of diversity, freedom of association and collective bargaining), occupational health and safety, environmental responsibility, and respect for data protection by design and by default.

With this commitment the Company strives for sustainable progress, to make the Company and the communities in which it operates more prosperous, more inclusive and more resilient, without leaving anyone behind.

2.1 EMPLOYMENT PRACTICES

2.1.1 Rejection of forced or compulsory labor and child labor

The Company rejects the use of any form of forced or compulsory labor¹ and any form of slavery and human trafficking - as defined by ILO Convention n. 29 - and does not confiscate either money or identity papers to retain workers against their will.

The Company considers children and young workers as groups mostly likely affected, that is why takes the utmost care in respecting their rights across all the activities connected to the value chain.

The Company rejects the use of child labor. Workers' minimum age is defined by the existing legislation in the country where the activities are conducted by the Company, and in any case should not be lower than the minimum age established by ILO Convention n. 138.

2.1.2 Respect for diversity and non-discrimination²

The Company promotes principles of diversity, inclusion, and equal treatment and opportunity, and is committed to guaranteeing the right to working conditions that are respectful of personal dignity, as well as creating a working environment where people are treated fairly and valued for their uniqueness.

The Company is committed to protecting the physical and psychological integrity and individuality of each person, and oppose all forms of behavior that result in discrimination in relation to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and all other forms of individual diversity, or that is detrimental to the person and their convictions or preferences. Accordingly, the Company promotes people's freedom of expression.

The Company does not tolerate physical, verbal, visual, sexual, or psychological harassment such that results in a working environment that is denigrating, hostile, humiliating, intimidating, offensive, or unsafe.

The Company is committed to provide a just energy transition for everyone also through the offer of innovative and inclusive services for the customers, regardless of their age, for weak, destitute, marginalized, vulnerable people, paying particular attention to people with disabilities.

The Company undertakes to always respond to suggestions and complaints made by customers and consumer associations, making use of appropriate and timely communication systems (e.g., call center services and email addresses), and to consider the needs of all its customers, paying particular attention to people with disabilities.

2.1.3 Freedom of association and collective bargaining

The Company protects the right of the people working with it to form or take part in organizations aimed at defending and promoting their interests. Likewise, the Company respects their right to be represented, within the various working units, by unions or other forms of representation elected in accordance with the legislations and practices in force in the varying countries where they work.

Collective bargaining is the favored instrument for setting contractual conditions of the people working with the Company as well as regulating relations between management and unions.

2.1.4 Health, safety, and well-being

The Company considers the health, safety, and psychological, relational, and physical well-being of individuals the most precious asset to be protected in any moment, at work, as well as at home and during leisure time.

The Company is committed to developing and disseminating a health, safety, and well-being culture, to ensure that workplaces are free from health and safety hazards and to promoting behaviors oriented towards work-life integration.

The Company is actively involved in promoting personal and organizational well-being as an enabler of the engagement and innovative potential of people.

By doing so, the Company aims at increasing awareness of risks and promoting responsible behaviors.

The Company's suppliers and contractors are an integral part in the development and awareness programs: each person must feel that they are responsible for their own health and safety as well as for the others.

The Company's commitment also unfolds in integrating health and safety in processes and in training activities, in a rigorous selection and management of suppliers/contractors, in sharing knowledge and in constantly benchmarking of the practices.

2.1.5 Just and favorable working conditions

Every person working with the Company, along the entire value chain, has the right to conditions that respect their health, safety, well-being and dignity, maximum working hours, daily and weekly rest periods and an annual period of paid leave.

Remuneration of the people the Company employs is based on fair reward principles as well as respecting pay equality for men and women carrying out the same job (ILO Convention n. 100). Minimum compensation cannot be lower than the minimum living wage set in the collective labor contracts and law regulations in force in each country in accordance with the provisions of the ILO Conventions.

The Company also believes in the importance of professional orientation and training for the development of its people and their skills, even the more so in situations impacted by the energy transition and that prompt to adopt a circularity-based approach which translates into requalifying and enhancing existing potential by way of reskilling and upskilling programs to foster a just transition.

2.2 COMMUNITIES AND SOCIETY

2.2.1. Environment

The Company believes the current challenge posed by climate change phenomena is the main impediment to people's enjoying their own rights.

[Protection of the environment and natural resources](#), climate action, and contribution to a sustainable economic development are strategic factors in the planning, performance, and development of the Company's operations, alongside the broader commitment to accelerate the decarbonization and electrification processes to allow the global warming containment objectives in accordance with the Paris Agreement while at the same time driving achievement of the United Nations Sustainable Development Goals.

The Company commitment is testified by the four key principles (alongside the 10 strategic objectives) of Company's environmental policy:

1. Protecting the environment by preventing impacts to it;
2. Improving and promoting the environmental sustainability of products and services;
3. Creating shared value for the Company and stakeholders;
4. Complying with legal obligations and voluntary commitments, promoting ambitious environmental management practices.

The Company environmental policy also includes a specific commitment on respecting [biodiversity](#).

2.2.2. Respecting the rights of communities

The Company is aware that its activities can have a direct or indirect influence on the

communities where the Company operate: that is why responsible community relations constitute a pillar of the Company strategy.

Individual conditions, economic and social development, and general well-being of collectivity are strictly connected: the Company therefore commits to conducting its capital expenditure in a sustainable manner and to promoting cultural, social and economic initiatives for the local and national communities involved to advance social inclusion through education, training and access to energy.

The Company also commits to ensuring that its products and services are designed to be accessible for all and does not compromise the safety and physical integrity of its customers, as far as reasonably foreseeable.

2.2.3. Respecting the rights of local communities

The Company is committed to respecting the rights of local communities and to contribute to their economic and social growth.

Likewise, the Company collaborates with suppliers, contractors and partners that respect Human Rights and contributes to the social-economic development of the communities where its operate.

This goes through and is not limited to promoting free, prior, and informed consultation activities and implementing social inclusion actions (local manpower, health and safety training, development of projects aimed at supporting and development of local communities - also in partnership with local organizations). Indeed, knowledge of the specific local requirements and a continuous listening to the communities needs allow the Company to develop robust actions also in unexpected and unprecedented emergency conditions.

More specifically, in the designing and construction of infrastructure projects, the Company is committed to taking due account, within proper environmental and social impact assessments, of their environmental footprint and of the respect of Human Rights in the areas where the projects will be developed.

Taking as a reference the Voluntary Principles on Security and Human Rights, the Company requires that private security forces protecting its personnel and assets in operating areas act in the same manner and in a way consistent with the applicable national law and regulation and international standards.

2.2.4. Respecting the rights of indigenous and tribal peoples³

The Company pays particular attention to the most vulnerable communities, such as indigenous and tribal ones, and commits to respect the United Nations Declaration of the rights of Indigenous Peoples.

In developing its projects, the Company commits to engage all the relevant stakeholders, including indigenous and tribal communities as we believe active community engagement throughout the process is essential.

2.2.5. Integrity: zero tolerance of corruption

The Company rejects corruption in all its forms, both direct and indirect, since it believes it

is one of the factors undermining institutions and democracy, ethical values and justice, and the well-being and development of society.

To this end, the Company reiterates its commitment to fight corruption through a plan called "[Zero Tolerance of Corruption](#)" which is one of the pillars on which its anti-bribery management system is grounded.

2.2.6. Privacy

The Company respects the confidentiality and right to privacy of its stakeholders and is committed to the correct use of the information and data relating to the people working in the organization, to the customers and to any other stakeholder.

Data protection and processing are an important challenge for the Company in the era of digitalization and market globalization.

The Company processes personal data in compliance with the fundamental rights of data subjects and abides by the rights and principles recognized in law, notably respect for private and family life, home location details and communications, personal data protection, freedom of thought, conscience and religion, freedom of expression and information.

Data protection by design (i.e., incorporated from the design of each corporate process), and by default (i.e., processing limited only to the strictly necessary extent and just to the period needed to perform data collection) are an integral part of the digitalization processes, as are risk analysis and the protection of sensitive data.

Privacy is assured by adopting international standards and the way data is processed and stored is defined with the support of the Data Protection Officer (DPO) in compliance with the Company's internal policies and any international and national regulations.

The Company also strives to monitor all third-party companies that may be able to use the personal data of customers. To this end, dedicated clauses are included in contracts with partners who use personal data to carry out specific activities, such as sales services or customer satisfaction surveys.

2.2.7. Communications

The Company is committed to ensuring that institutional and commercial communications are non-discriminatory and are respectful of different cultures, while also not adversely affecting the most vulnerable audiences, such as children and the elderly.

In addition, the Company requires that contracts and communications addressed to the customers should:

- be clear and simple, drawn up using a language as close as possible to the one normally used by the people for which the message is intended to;
- abide by statutory legislation, without resorting to evasive or improper practices;
- be exhaustive and not omit any relevant item that might affect the customer's decision;

- be available on the Company's websites;
- be accessible, in order to accommodate the needs of people with disabilities.

3. IMPLEMENTATION AND MONITORING

Implementation and monitoring of the commitment to the principles illustrated hereof relies on an appropriate due diligence process⁴.

The perceived risk assessment, together with the gap analysis, makes it possible to assess the residual risk and define any improvement actions required. Specific action plans are therefore developed for each country of presence, as well as a centrally managed improvement plan that has the objective of harmonizing and integrating. Any necessary remedy highlighted by such process is included in the Enel Russia Sustainability Plan.

Suppliers are constantly monitored insofar as Human Rights are concerned thanks to artificial intelligence tools that enable early identification of elements that might become critical and that prompt the development of the necessary ensuing actions.

Management of the positioning on human rights is entrusted to the Sustainability Department. The Department is also responsible for integrating the Policy on Human Rights in corporate processes and monitoring that due diligence activities are carried out properly.

3.1 STAKEHOLDERS GRIEVANCE

Stakeholders, whether internal or external, believing a violation might have occurred, may resort to the following contact channels:

- by e-mail: audit.coe@enel.com;
- by post: Internal Audit Department, PJSC Enel Russia, Russia, Moscow, post code 115093, Pavlovskaya street, building 7, block 1.

The Internal Audit Department analyzes the grievance, contacting the author, if necessary, and the person responsible of the alleged violation, ensuring uniform treatment at Company level, in compliance with internal policies and local regulations.

Whenever, following a grievance, a violation of the principles contained in the Policy hereof is ascertained, the relevant procedure provided for in the Code of Ethics shall be implemented⁵.

The Company ensures that whistleblowers are not subject to any acts of retaliation and that their identity remains confidential, unless otherwise required by the law.

3.2 TASKS OF THE BOARD COMMITTEES OF ENEL RUSSIA

The Strategy Committee of the Board of Directors having examined the Human Rights Policy hereof and having submitted its amendments to the approval of the Board of Directors, will evaluate any further amendments or integrations thereof and propose them to the Board of Directors.

3.3 TASKS OF THE SUSTAINABILITY DEPARTMENT

The Sustainability Department has the following duties:

- planning and coordinating the implementation of the due diligence process, in conjunction with the other relevant functions involved, to the extent of the areas of their responsibility;
- reporting to the Strategy Committee of the Board of Directors on the implementation of the due diligence process;
- initiation of submission and preparation of materials on amendments to this Policy for submission to the Strategy Committee of the Board of Directors and of the Company and for approval by the Board of Directors of the Company.

4. REVISION

Based on the Strategy Committee of Board of Directors proposal, this Policy will be revised periodically to ensure its adequacy and effective implementation.

All revisions shall be subject to approval by the Board of Directors of the Company.

5. COMMUNICATION AND TRAINING

The Human Rights Policy shall be circulated to internal and external stakeholders through specific communication initiatives. Training initiatives (not requiring any certification and (or) attestation) will be carried out to ensure that the Policy is properly understood by all Enel Russia employees.

6. DEFINITIONS

1.1.1. Forced and compulsory labor

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 voluntarily.
(Art. 2 Par. 1, ILO Convention n. 29)

1.1.2. Business relationships

Relationships with business partners and enterprises in the value chain, as well as any other government or non-government entity, directly linked to the operations, products, or services of the enterprise.
(Principle 13 “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework)

1.1.3. Discrimination

The term discrimination includes both direct and indirect discrimination, respectively:

- a) any distinction, exclusion or preference based on race, colour, sex, age, sex 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;

- b) any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. (Art. 1 Par.1, ILO Convention n. 111)

1.1.4. Indigenous and Tribal Peoples

These two terms refer to, respectively:

- a) peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of 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 peoples in independent countries whose social, cultural, and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations. (Art. 1.1, ILO Convention n. 169)

1.1.5. Due diligence

Within the Guiding Principles on Business and Human Rights (Principles 17-21), the term due diligence on human rights refers to a continuous management system that an enterprise implements according to the industry it operates in, its operating environments, the size of the enterprise and other factors, to ensure that it respects human rights and that it is not a party to the abuse of those rights. This involves 'identifying, preventing, mitigating and accounting' the potential negative impacts generated by the enterprise.

1.1.6. Partner

Natural persons or legal entities having an interest in PJSC Enel Russia related to the joint development of new projects. (PJSC Enel Russia Code of Ethics)

1.1.7.

1 Forced or compulsory labour means: 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 voluntarily (See Art. 2.1 of ILO Convention n. 29).

2 The term discrimination includes both direct and indirect discrimination, respectively:

- a) any distinction, exclusion or preference based on race, colour, sex, age, sex 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;
- b) any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. (See Art. 1.1 of ILO Convention no. 111)

3 These terms refer to:

- a) tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations;
- b) peoples in independent countries who are regarded as indigenous on account of their descent from the

populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions. (See Art. 1.1 of ILO Convention no. 169)

4 Within the Guiding Principles on Business and Human Rights (Principles 17-21), due diligence on human rights refers to a continuous management system that an enterprise implements according to the industry it operates in, its operating environments, the size of the enterprise and other factors, to ensure that it respects human rights and that it is not a party to the abuse of those rights. This involves 'identifying, preventing, mitigating and accounting' the potential negative impacts generated by the enterprise

5 Principle 4.5 of the Code of Ethics PJSC Enel Russia.