



CODE OF ETHICS

November 2025

All Enel Generación Chile S.A. stakeholders may report violations or suspected violations of the Code of Ethics in the following ways:

- in writing, i.e., through the web, using the online reporting system available at the following [link](#);
- verbally by phone, contacting the numbers accessible via the aforementioned website;
- or, at the reporting party's request, through an in-person meeting scheduled within a reasonable time, through the channels indicated above.

1 INTRODUCTION

This Code sets out the ethical commitments and responsibilities in the management of business and corporate activities, assumed by the people of Enel Generación Chile S.A., hereinafter “Enel” or “the Company,” and by the group’s companies, funds and foundations of which Enel is a part, whether they are directors, employees or collaborators in any capacity within these legal entities.

Enel is committed to the creation of sustainable value, from an environmental, social and financial perspective, and shared with all its stakeholders, internal and external, innovating and pursuing excellence throughout the value chain of the businesses in which it operates.

All of this consistent with Enel’s Purpose, Vision and Values listed below.

Purpose: Build the future through sustainable power

We build a better future through innovative and responsible energy solutions to minimize environmental impact and create a better world for future generations, looking beyond the present.

Vision: Drive electrification, fulfilling people’s needs and shaping a better world

We lead the energy transition by facilitating access to cleaner and more efficient solutions. We have always stood by people, helping them manage their energy consumption consciously and actively contributing to a more sustainable lifestyle. We demonstrate respect and commitment to future generations, protecting the environment and building a sustainable and better future for everyone, with a long-term vision.

Values:

Trust: we build trusting relationships with our stakeholders, acting and operating with responsibility, integrity, legality and autonomy. We collaborate openly to increase trust in ourselves and in others, to create value for everyone. We develop skills and trusting relationships to better manage diversity.

Innovation: innovation is a value for us, but also a goal and a mindset. We believe in innovation that arises from curiosity, from an attitude toward research and continuous learning, from the ability to think outside the usual frameworks to open up energy to new uses, technologies, people. We consider ideas innovative when we manage to translate them into concrete solutions that create value for us and our stakeholders.

Proactivity: we adopt an entrepreneurial spirit in caring for our Company, in building our future and being protagonists of the energy transition. We take the initiative proactively to achieve concrete and sustainable results, focusing on our customers’ needs and making the best use of our resources.

Respect: we respect ourselves and others, valuing each person’s uniqueness. We act with responsibility, following the rules to ensure safety, health, environmental protection and respect for human rights. We recognize the value of differences, ideas, opinions and merit to ensure quality in everything we do.

Flexibility: for us this represents the ability to manage change and turn it into an opportunity; it is the ability to anticipate and accept it. Flexibility means knowing how to redefine priorities considering the context, always acting with coherence, simplicity and speed. Finally, flexibility is the attitude toward continuous improvement and the willingness to learn from others and from experience.

Protection of transparent dialog with stakeholders

Enel aspires to maintain and develop a relationship of trust with its stakeholders, that is, with those categories of individuals, groups or institutions whose contribution is required to carry out Enel's mission or who, in any way, show an interest in its achievement.

Stakeholders are all those with a direct or indirect interest in the company's activity, such as, for example, companies and trade associations, customers, the financial community, national and international institutions, civil society and local communities, the media, employees, suppliers, contractors, the organizations and institutions that represent them, and partners, considered as natural or legal persons, with an interest in Enel for the joint development of new projects.

The value of reputation and fiduciary duties

Good reputation is an essential intangible resource that, externally, favors investment from the financial community, a lasting relationship with customers, the attraction of the best talent, the trust of suppliers, reliability towards creditors and, internally, is nourished by a climate of collaboration and an open working approach that includes all forms of diversity.

The Code of Ethics clarifies Enel's specific duties toward stakeholders (fiduciary duties) and their effective compliance is essential to ensure Enel's reputation.

Therefore, the Code of Ethics is made up of:

- General principles¹ on relationships with stakeholders, which define the reference values in Enel's activities.
- Codes of conduct toward each category of stakeholder, which specifically provide the guidelines and rules that Enel's people must follow to prevent the risk of unethical behavior.
- Mechanisms of action, which describe the control system for compliance with the Code of Ethics and for its continuous improvement.

The value of reciprocity

This Code is based on an ideal of cooperation focused on a reciprocal advantage for the parties involved, respecting the role of each one. For this reason, Enel requires each stakeholder to behave toward the company according to principles and rules, inspired by a similar idea of ethical conduct.

Validity and Application of the Code

The principles and provisions of this Code of Ethics are intended for members of the Board of Directors, and of other control and supervisory bodies of the Company and its subsidiaries, as well as to directors, employees and collaborators who maintain contractual relations with the group in any capacity, including occasional and/or temporary ones.

Likewise, the Company requires its partners to adopt conduct in line with the general principles of this Code.

The Code of Ethics is valid in all Countries where Enel operates, recognizing their cultural, social and economic diversity.

¹ The general principles are inspired by the United Nations Universal Declaration of Human Rights of 1948 and the European Convention on Human Rights of 1950.

2 GENERAL PRINCIPLES

Enel contributes to a world in which energy is at the service of the community to create development, growth and a better quality of life for everyone, in line with its Purpose, Vision and Values, and is inspired by the general principles described below. Enel has made a concrete commitment to contribute to the achievement of the United Nations Sustainable Development Goals.

2.1 Impartiality and non-arbitrary discrimination

When making decisions that affect relationships with its stakeholders (relations with customers, relations with shareholders, personnel management or work organization, management of suppliers and partners, relations with the surrounding community and the institutions that represent it), the Company rejects any type of arbitrary discrimination based on sex, age, disability status, affective orientation and gender identity, ethnicity, religious beliefs, political ideologies and other forms of diversity.

2.2 Legality

Within the framework of their professional activity, Enel's people must diligently comply with applicable regulations, the Code of Ethics, corporate policies, procedures and internal regulations. Under no circumstances can the pursuit of Enel's interests justify dishonest conduct.

2.3 Transparency in case of conflicts of interest ²

In carrying out any activity, conditions or situations in which the parties involved are, or appear to be, in a conflict of interest must be avoided.

This is understood to mean an apparent, potential or real condition or situation in which the secondary interest (economic, financial, family or of another nature) of the Enel person could affect the impartiality of business decisions and the fulfillment of duties and responsibilities, and likewise, the case in which representatives of customers, suppliers or public institutions act in their relations with Enel contrary to the fiduciary duties associated with their positions.

Declaring a condition or situation of conflict of interest is a form of protection for both the individuals and the Enel brand.

2.4 Confidentiality

Enel guarantees the confidentiality of the information it handles and refrains from seeking confidential data, except with the consent of the data owner and in accordance with current legal regulations. Furthermore, Enel's people must not use confidential information for purposes unrelated to the exercise of their own activity, as in the case of misuse of confidential information or market manipulation, and must apply the principle of minimization and need-to-know when sharing information.

2.5 Relations with shareholders

Enel considers it to be in its own specific interest – in addition to being a duty toward the market – to ensure a constant and open relationship, based on mutual understanding of roles, with shareholders in general and with institutional investors, in order to increase the relative level of understanding about the activities carried out by the company. Within this framework, Enel maintains a dialogue with investors based on the principles of fairness and transparency, in compliance with European Union and national regulations on market abuse and in line with international best practices.

2.6 Valuing the investment of shareholders and bondholders

Enel strives to ensure that economic and financial performance is sufficiently adequate to create long-term value, while safeguarding financial sustainability, in order to adequately compensate for the risk assumed by investors.

2.7 Value of people

Enel relies on its people as an enabling factor to face a world undergoing permanent transformation. For this reason, Enel safeguards and increases the value of the people who work in the company, promoting continuous learning and professional development.

In particular, Enel ensures that its actions do not affect the dignity or autonomy of individuals and that work organization choices protect the value of individuals and the balance between work and personal life.

2.8 Integrity of the person

Enel guarantees the physical and moral integrity of its people, working conditions that respect personal dignity and individual specificities, and safe and healthy work environments. It also acts to ensure that no incidents of harassment, intimidation, mobbing or stalking occur in the workplace. All of the foregoing, in accordance with applicable legislation on the matter and in particular with Law No. 21,643, which establishes actions aimed at preventing sexual and workplace harassment and violence at work.

Requests or threats that induce people to act against the law, the Code of Ethics, or company policies and procedures aimed at adopting behaviors harmful to individual convictions or preferences are not tolerated.

2.9 Fairness

In entering into and managing contractual relationships that involve establishing employment relationships, Enel undertakes to guarantee fairness and correctness, avoiding abuses of authority.

2.10 Transparent, complete, correct, and truthful information

Enel's people must provide complete, transparent, understandable and accurate information so that, when defining relationships with the company, stakeholders can make autonomous and informed decisions about the interests at stake, the alternatives and the relevant consequences. In particular, when drafting contracts, Enel undertakes to specify to its counterparty, in a clear and understandable manner, the behaviors it will apply in all foreseen circumstances.

2.11 Diligence and precision in activities and contract execution

Contracts must be executed consciously in accordance with what has been established by the parties. Enel undertakes not to take advantage of conditions of lack of knowledge or incapacity of the other parties.

Enel strives to ensure, in existing relationships, that anyone acting on its behalf and for its own account does not take advantage of contractual loopholes or unforeseen events to renegotiate the contract solely for the purpose of exploiting the position of dependence or weakness in which the counterparty finds itself.

2.12 Quality of services and products

Enel directs its activity toward satisfying and protecting its customers by listening to requests that may favor an improvement in the quality of products and services.

For this reason, Enel focuses its innovation, research, development and commercialization activities on high standards of quality and safety for its services and products.

2.13 Fair competition

Enel seeks to uphold the value of competition by complying with the antitrust laws in force in the Countries where it operates, which provide for certain common principles, including:

- (i) the prohibition of restrictive competition agreements;
- (ii) the prohibition of abuse of a dominant position;
- (iii) prior control of concentration operations.

Respect for competition law represents a fundamental value of Enel's corporate culture and is an essential principle for guiding business decisions and relations with customers, competitors and suppliers.

2.14 Responsibility towards the community

Enel is aware of the influence, even indirect, that its activities may have on individual conditions, on economic and social development and on the general well-being of the community, as well as of the social relevance in the communities where it operates.

For this reason, Enel wants to conduct its investments in a sustainable manner, respecting local and national communities, promoting initiatives of cultural and social value and protecting the identity of native peoples.

2.15 Protection of the environment

The environment is a primary asset that Enel is committed to safeguarding; for this purpose, it plans its activities seeking a balance between economic initiatives and essential environmental requirements, taking into account the rights of future generations.

Therefore, Enel is committed to reducing the environmental and landscape impact of its activities and to preventing risks to populations and the environment, respecting current regulations and also taking into account the highest applicable standards and best available technologies.

Enel is committed to guaranteeing clean and accessible energy, promoting the decarbonization of production, the development of renewable energies and the electrification of consumption.

2.16 Protection of personal data

In order to guarantee respect for the rights and freedoms of data subjects, Enel adopts high regulatory and security standards in the management of the personal data of its employees, customers and stakeholders. Enel has internal policies and procedures to guarantee the protection of the personal data processed and to improve the security of the systems and IT applications where such data is contained and processed.

Enel adopts a risk-based approach to manage the risks arising from personal data processing activities. In accordance with privacy regulations, Enel has established various tools to assess, manage and mitigate such risks, such as Privacy by Design³, the Data Protection Impact Assessment (DPIA) and the Data Transfer Impact Assessment (DTIA).

2.17 Ethical principles regarding artificial intelligence

Enel is committed to promoting the use of Artificial Intelligence (AI) systems in accordance with the principles and guidelines on ethics and “trustworthy AI” developed by the European Commission and UNESCO.

In the purchase, development and adoption of AI systems, Enel undertakes to respect the values of the Rule of Law and all applicable regulations in the countries where it operates, and to adhere to the principles of respect for human rights, harm prevention, fairness and transparency, paying special attention to issues of inclusion and diversity and to the protection of all stakeholders, especially those who may belong to vulnerable groups.

3 CODES OF CONDUCT

SECTION I. CODES OF CONDUCT IN RELATIONS WITH SHAREHOLDERS

3.1 Corporate Governance

Enel’s corporate governance system complies with the principles included in the regulations applicable to listed companies, and is also inspired by international best practices. The corporate governance system adopted by Enel is essentially focused on the objective of sustainable success, being aware of the relevance from the environmental and social point of view of the activities to which the group is committed and the need arising from adequately considering the interests of the relevant stakeholders in its performance.

Internal Control and Risk Management System

The internal control and risk management system (“ICRMS”) is made up of the set of rules, procedures and organizational structures aimed at the effective and efficient identification, measurement, management and monitoring of the main business risks within the Company, in order to contribute to the sustainable success of the company, defined by the creation of long-term value for its shareholders, while considering the interests of other relevant stakeholder groups.

³ Privacy by design is understood as the principle of data protection from the design of the product/service, implementing appropriate technical and organizational measures for the specific processing; while Privacy by default provides that, by default configuration, companies must process only the personal data necessary and sufficient for the intended purposes and for the period strictly necessary for such purposes. See also “European Regulation for the protection of personal data – article 25.”

The ICRMS is integrated into the more general organizational structures and corporate governance adopted by the company and the group, and is inspired by the best practices existing at national and international level. In particular, this system considers the recommendations of the Italian Corporate Governance Code and is defined according to the “Internal Control – Integrated Framework” model issued by the Committee of Sponsoring Organizations of the Treadway Commission (known as the “COSO Report”), which represents the internationally recognized reference model for the analysis and integrated evaluation of the effectiveness of the ICRMS.

An effective ICRMS helps direct the company in a manner consistent with the objectives defined by the Board of Directors, as it allows the identification, evaluation, management and monitoring of the main risks in relation to their ability to influence the achievement of such objectives. In particular, the ICRMS helps ensure the protection of corporate assets, the efficiency and effectiveness of business processes, the reliability of information provided to corporate bodies and the market, compliance with laws and regulations, and also with bylaws and internal procedures.

External Audit

Enel commissions the audit of the consolidated balance sheet in a transparent manner and in strict compliance with current regulations. In order to preserve the independence of the audit firms working within the group, a specific procedure has been formalized that regulates engagements to such firms or related entities, by group companies. Since its adoption, it has represented a valid governance oversight in the activity of controlling and monitoring the independence of the group’s main auditor by Enel.

Under this procedure, the Board of Directors must previously approve the granting, by group companies, of each additional engagement – that is, one that is not the statutory audit of accounts and provided no cases of incompatibility contemplated by law arise – in favor of the group’s main auditor or entities belonging to it.

3.2 Information to the market

Enel acts with full transparency, adopting specific procedures to guarantee the correctness and truthfulness of corporate communications (balance sheets, periodic reports, issuance prospectuses, etc.) and to prevent corporate crimes (such as false corporate communications, obstruction of the exercise of the functions of supervisory authorities, etc.) and market abuse (insider trading and market manipulation).

Likewise, Enel makes available all the information necessary so that investors’ decisions can be based on knowledge and understanding of business strategies and management developments.

Enel’s information to the market is characterized by respect for regulatory provisions and also by understandable language, completeness, correctness, timeliness and symmetry with respect to all investors.

Enel considers it to be in its own specific interest, as well as a duty toward the market, to establish a continuous dialogue, based on mutual understanding of roles, with shareholders and institutional investors.

Enel undertakes to provide adequate information to institutional investors, financial analysts and shareholders through specific presentations and periodic roadshows; with retail shareholders, Enel undertakes to ensure:

- (i) homogeneity of information, including through publication on the website of all documents intended for institutional investors;
- (ii) simultaneity with the information provided to institutional investors;
- (iii) provision of dynamic tools for communication through the web.

3.3 Control of privileged information

Enel adopts a Manual for the Management of Information of Interest for the internal management and processing of confidential information and for external communication of corporate documents and information, with special reference to privileged information. This Manual serves to preserve the confidential nature of confidential information, while guaranteeing that market information relating to corporate data and information is correct, complete, adequate, timely and non-selective.

Enel has created (and keeps regularly updated) a register in which are recorded the natural or legal persons who have access to privileged information as a result of their work or professional activity, the functions exercised on behalf of Enel, as well as a list of persons who have access to relevant information. These instruments are intended, among other things, to raise awareness among registered entities about the privileged or relevant nature of the information to which they have access, while facilitating the Supervisory Authority's control activities regarding compliance with the rules established to protect the integrity of the markets.

Enel employees and collaborators are expressly prohibited from engaging in behavior that could give rise to insider trading and unlawful disclosure of such information, as well as market manipulation. In order to guarantee maximum transparency for operations carried out by the Company's collaborators, Enel adopts rigorous procedures for managing confidential information in accordance with current regulations and international best practices.

SECTION II. CODES OF CONDUCT IN RELATIONS WITH ALL OTHER STAKEHOLDERS

3.4 Treatment of Information

Enel treats stakeholders' information with full respect for the confidentiality and privacy of the parties concerned.

For this purpose, specific policies and procedures for the protection of information are constantly applied and updated. In particular, Enel:

- Defines an organization for the treatment of information that ensures the correct separation of duties and responsibilities.
- Classifies information by increasing levels of criticality and adopts appropriate countermeasures at each stage of processing.
- Requires third parties involved in information processing to sign confidentiality agreements.

3.5 Gifts, hospitality, and benefits⁴

No form of gifts, hospitality or benefits that could be interpreted as exceeding normal commercial or courtesy practices, or intended to seek favorable treatment in the conduct of any activity related to Enel, is permitted.

In particular, it is prohibited to give gifts, hospitality and benefits to public officials, Chilean and foreign, auditors, Enel directors, members of control and supervisory bodies, or their family members, that could influence independence of judgment or induce the securing of any advantage.

This rule, which admits no exemptions, not even in those Countries where offering gifts, hospitality or benefits of value to business partners is customary, applies both to gifts, hospitality or benefits promised or offered as well as those received.

Any gift, hospitality or benefit offered or received must:

- not be motivated by the will to exert illegal influence or the expectation of reciprocity;
- be reasonable given the circumstances;
- be in good taste and consistent with generally accepted standards of professional courtesy;
- be occasional in nature;
- be of low value.

The gift, hospitality or benefit must not be such as to damage the integrity or reputation of either party, nor should it be interpreted as intended to obtain advantages.

In any case, Enel refrains from engaging in practices not permitted by law or commercial usage. Enel's gifts are characterized by being intended to promote its own brand. Gifts offered must be managed and authorized in accordance with corporate policies and procedures and must be duly documented.

3.6 External communication

Enel's communication with its stakeholders (including through the media) is based on respect for the right to information; it is never permitted to disclose false or biased news or comments.

Every communication activity respects the law, rules and professional conduct practices, and is carried out with clarity, transparency and timeliness, protecting, among other things, price-sensitive information and industrial secrets.

Any form of pressure or favorable treatment by the media is prohibited.

⁴ See also the Enel Group Gift and Hospitality Policy in Chile

All press releases are available on the website www.enel.cl, so that they are fully accessible; the Enel institutional portal offers online services and also presents a series of channels to explore topics related to the core business (the environment, ecology, science and the geoeconomics of energy resources, etc.) and online exchange and discussion with stakeholders.

To ensure that information is complete and consistent, Enel's relations with the media may only be established under the coordination of the relevant functions in accordance with internal procedures.

Enel participates in conferences, seminars and round tables and allows technical, scientific, social and economic publications relating to its activities, in accordance with the following general rules of conduct:

- Participation of a limited number of Enel people in each conference.
- Preventive communication of participation and the topics addressed to the External Relations Function.

CHAPTER I. CODES OF CONDUCT IN RELATIONS WITH ENEL PEOPLE

3.7 Selection of people

The evaluation of personnel to be hired is carried out based on the correspondence of candidates' profiles with those expected and with business requirements, in compliance with equal opportunities for all forms of diversity. The information requested is strictly related to verifying the aspects contemplated by the professional and psychological aptitude profile, respecting the candidate's private sphere and opinions.

Within the limits of available information, the People and Organization function adopts appropriate measures to prevent discrimination, nepotism or forms of favoritism during the selection and hiring phases.

3.8 Establishment of the employment relationship

Personnel are hired through an employment contract or a fee-based service agreement; illegal forms of work are not tolerated. During the establishment of the employment relationship, each collaborator receives precise information, among other things, about:

- Characteristics of the position and the tasks to be performed.
- Regulatory and remuneration elements, as regulated in the national collective labor agreement.
- Rules and procedures to be adopted to eliminate or, when not possible, reduce potential risks to health and safety during work activity.
- During the hiring phase, selected candidates must sign a declaration of commitment to comply with the provisions of the Code of Ethics.

This information is presented to the collaborator in such a way that acceptance of the assignment is based on effective understanding of it.

3.9 Management of people

Enel guarantees equal opportunities and the absence of arbitrary discrimination in the management of people, valuing the unique contribution of each person.

In the context of people management and development processes (for example, in the case of promotion or transfer), as in the selection phase, decisions made are based on the correspondence between expected profiles and possessed profiles and/or on merit considerations (for example, allocation of incentives based on results achieved).

Access to positions and responsibilities is also established considering competencies and abilities and, likewise, compatible with organizational requirements, forms of flexibility in work organization are favored, which facilitate parental management and the burdens of family care and assistance.

The evaluation of working people is carried out more broadly, with the participation of managers, the People and Organization Function and, as far as possible, the individuals who have interacted with the person being evaluated.

Within the limits of available information and the protection of privacy, the People and Organization Function works to prevent any form of favoritism.

Dissemination of personnel policies

Personnel management policies are available to all Enel people through corporate communication tools.

Valuing people and continuous learning

Enel fully values all workers within the organization, promoting the development and growth of working people through the use of knowledge-sharing tools and training activities.

The key element in training is the expansion of social and technical skills, through experiences and training and development programs based on individual awareness, with the aim of increasing professional value, respecting personal attitudes and promoting the development of new skills to face new contexts.

Enel promotes a diverse training offering, delivered through physical classrooms, virtual classrooms or the corporate platform, in an integrated ecosystem that guarantees the continuous development of skills, focusing on individuals' needs, passions and attitudes, and allowing them to expand their network of relationships, as well as share intercultural experiences.

In order to guarantee that the development of business skills is in line with the evolution and new needs of the outside world, Enel constantly collaborates with entities, institutions and universities, promoting discussion and the exchange of knowledge.

Management of people's working time

Each manager must assess the working time of collaborators, requiring performance consistent with the exercise of their duties and work organization plans.

Requesting, as an act due to a hierarchical superior, services, personal favors or any other behavior that constitutes a violation of this Code of Ethics, constitutes an abuse of the position of authority.

Involvement of people

The involvement of people is essential in achieving business objectives and is materialized through active, collaborative participation based on independent judgment.

The process of formulating final decisions takes into account the various points of view, compatible with business requirements.

Accessibility

Enel is committed to creating inclusive work frameworks, paying special attention to physical accessibility to workplaces, digital accessibility of information, documents and communications, and the specific needs of assistive work tools.

Flexibility and workplaces

Enel favors flexible arrangements for carrying out work, ensuring equal opportunities for contribution and fairness in valuing people based on results obtained, regardless of the mode of work development.

Wellbeing

Enel actively promotes behaviors focused on harmony between work and personal life and is actively committed to promoting people's wellbeing by placing them at the center of the organization.

3.10 Interventions on work organization

In the case of work reorganization, the value of people is protected by contemplating, when necessary, training and/or professional retraining actions. To this end, Enel respects the following criteria:

- The burdens of work reorganizations must be distributed as evenly as possible among all people and consistently with the effective and efficient exercise of business activity.
- A person may be assigned different tasks from those previously performed, in compliance with regulatory provisions, providing, when necessary, adequate training for the acquisition of new and different skills.

3.11 Health and safety

Enel considers health, safety and the psychophysical integrity of individuals as the most precious asset to protect at all stages of life, at work and at home and during leisure time, and is committed to developing, consolidating and disseminating a solid safety culture, in the conviction that success in its business activity and the value of the Company are based on the essential quality-health-and-safety pairing, based on prevention, knowledge of the rules and their timely observance.

Enel is committed to guaranteeing increasingly healthy and safe work processes and spaces, both for its employees and for all those who collaborate with them. It is also committed to creating an integrated safety approach at all levels of the organization, which goes beyond regulatory compliance, valuing internal and external experiences and best practices, promoting discussion with the main international players, rewarding and disseminating examples of excellence in workplace safety, and constantly seeking synergies, also with our suppliers, partners and customers.

To this end, a branched internal structure, attentive to the evolution of reference scenarios and to changes arising from risks, carries out technical and organizational interventions, based on the following fundamental principles:

- The consolidation of the awareness that each worker at Enel is responsible for their own health and safety and that of the people with whom they interact; the adoption and implementation of the “Workers’ Health and Safety Management System,” in accordance with internationally recognized standards, inspired by the principle of continuous improvement, which provide for the adoption of indicators to measure health and safety results across the entire organization and their monitoring, including through supervision and on-site control activities;
- The evaluation of all health and safety risks and the adoption of a systematic approach to eliminate them at the source or, when not feasible, to minimize them.
- The implementation of processes from a risk-based perspective that provides for monitoring and reassessment based on relevant events that have occurred, with the aim of eliminating the root causes and preventing their repetition in all Countries and in all business areas;
- The adoption of the best technologies and work methods focused on continuous improvement, the promotion of technological innovation and a data-based approach to improve equipment, methods and workspaces;
- The adoption of an information and training program for workers, based on the activity performed and the risks to which the workers themselves are exposed;
- The promotion of communication, at all levels of the organization, to disseminate the strategic principles of daily action and consolidate individual awareness;
- The consultation and participation of workers and their representatives as a fundamental lever to maximize the protection of health and safety, from the identification of risk situations to the choice of solutions to prevent and/or reduce them.

Likewise, Enel acts for the continuous improvement of the efficiency of corporate structures and processes that contribute to the continuity of the services provided and to national security, including participation in Civil Protection events, in Italy and in the other countries where it is present.

3.12 Protection of personal data

The protection of personal data is guaranteed through the adoption of international and national standards, aimed at responsible, lawful and transparent processing of personal data, with the support of the Data Protection Office.

Enel recognizes that the protection of personal data is a fundamental right, recognized in international instruments and in the Chilean Political Constitution, and as such implements technical, organizational and regulatory measures for its proper processing.

In addition, these standards also provide that the communication or disclosure of personal data may only be carried out in the cases and manners provided for by law to protect the affected person.

3.13 Integrity and protection of the person

Enel promotes the principles of diversity, inclusion and equal opportunity and is committed to creating a work environment where people are treated equitably, guaranteeing the right to working conditions that respect the dignity and uniqueness of each person.

Enel is committed to protecting the physical and psychological integrity and individuality of each person and opposes any form of behavior that causes arbitrary discrimination based on sex, age, disability, nationality, affective orientation and gender identity, ethnicity, religion, political opinions and any other form of individual diversity, or that is harmful to the person, their convictions or preferences.

Physical, verbal, visual or psychological harassment is not tolerated, meaning behaviors that create an undignified, hostile, humiliating, intimidating, offensive or unsafe work environment. The work environment is the place where the work activity is carried out.

In particular, harassment in the emotional, affective or gender identity sphere is not tolerated, nor are behaviors that may disturb individual sensitivities (for example, explicit allusions and comments or propositions).

3.14 Duties of working people

Any Enel person must act loyally and comply with the obligations undertaken in the employment contract and everything provided for by the Code of Ethics. Enel provides appropriate channels to report possible situations that may constitute violations of this Code and/or unlawful conduct.

3.15 Information management

Enel's organization is required to clearly classify information based on responsibility in specific processes, to ensure that information protection, processing and dissemination actions are consistent and conscious. Enel personnel must know and implement everything provided for by corporate policies and procedures on information security to guarantee its integrity, confidentiality, availability and traceability.

Enel is committed to drafting its own documents using clear, simple, objective and thorough language, allowing for possible verification by colleagues, managers or authorized external parties requesting it.

3.16 Conflict of interest

Enel's people must avoid apparent, potential or real conditions or situations in which the secondary interest (economic, financial, family or of another nature) of the person interferes or tends to interfere with the ability to make business decisions impartially and to fulfill their assumed duties and responsibilities.

By way of example and not exhaustively, the following situations may give rise to a conflict of interest:

- Performing a role of relevance (Director) and holding economic interests with suppliers, customers or competitors (such as, for example, holding shares, assignment of professional engagements, etc.), even through family members.
- Handling relations with suppliers, customers or business partners and having interests in their activities (for example, performing work/advisory activity), even through a family member or an external party linked to the Enel person.

An Enel person who considers themselves to be involved in a conflict of interest, even an apparent one, must refrain from making decisions related to the processes or matters in which the conflict arises, and must report it following the procedures set out in current corporate policy and procedures.

3.17 Use of company assets

Each Enel person must act diligently to protect company assets through responsible behavior and in accordance with the operating procedures established to regulate their use, accurately documenting their use.

In particular, each person must:

- Use the assets entrusted to them conscientiously and prudently.
- Avoid improper use of company assets that could cause damage or reduce efficiency or otherwise be contrary to the company's interest.

Each person is responsible for protecting the resources entrusted to them and has a duty to promptly inform the relevant units of possible threats or harmful events for Enel. Enel reserves the right to prevent misuse of its own assets and infrastructure through the use of accounting systems, reporting, financial control and risk analysis and prevention systems, subject to compliance with all applicable laws.

- Regarding IT applications, each person must:
- Rigorously adopt everything contemplated by the company's security policies, so as not to harm the functionality and protection of IT systems;
- Not send emails with threats and insults, not use disrespectful language, not express inappropriate comments that could offend the person and/or damage the company's image;
- Not browse illegal websites, with potentially harmful content, or sites that could endanger IT systems or spread malware infections.

CHAPTER II. CODES OF CONDUCT IN RELATIONS WITH CUSTOMERS

3.18 Impartiality and non-discrimination

Enel is committed to not discriminating against its customers arbitrarily.

3.19 Contracts and communications with costumers

Enel's contracts and communications with customers (including advertising messages) are:

- Clear and simple, drafted in language as close as possible to that normally used by the parties involved (for example, for the general public, avoiding clauses understandable only to experts, particularly in the description of the characteristics of the offers).
- In accordance with current regulations, without resorting to evasive or incorrect practices (such as, for example, the introduction of practices or clauses that are abusive toward consumers).
- Complete, so as not to neglect any element relevant to the customer's decision.

- Available on the company's websites.
- Accessible to people with different abilities and/or different educational levels, also through the application of "Plain Language" principles.

Enel is committed to ensuring that its customers always receive adequate assistance. To this end, forms and commercial communications always indicate a point of contact that the customer can turn to for clarification and support.

The objectives and recipients of communications determine, each time, the choice of the most suitable contact channels (invoice, telephone, newspapers, email) for the transmission of content without excessive pressure or insistence, and with special attention to avoiding misleading or untruthful advertising content.

Finally, it is Enel's responsibility to promptly communicate any information relating to:

- Possible modifications to the contract.
- Possible changes in the economic and technical conditions for the provision of the service and/or the sale of products.
- Results of checks carried out in compliance with standards required by control authorities.

3.20 Customer interaction behavior

Enel's behavior toward customers is based on availability, inclusiveness, respect and courtesy, from the perspective of a collaborative relationship and high professionalism. Enel is also committed to limiting the formalities required of its customers and to adopting simplified, secure and, when possible, digitalized and free payment procedures.

3.21 Quality control of customer satisfaction

Enel is committed to guaranteeing adequate quality standards for the services/products offered based on predefined levels, and to periodically monitoring perceived quality.

3.22 Relationship with customers

Enel is committed to always responding to suggestions and complaints from customers and consumer protection associations, using suitable and timely communication systems (for example, call center services, email addresses), paying special attention also to customers with disabilities. It is Enel's responsibility to inform customers of the receipt of their communications and of the time needed for responses, which should in all cases be brief.

Enel considers it a value-added to attend to professional associations and those that protect consumers for projects that have a significant impact on customers (preparation of bills, information on tariff options, etc.). To ensure compliance with these standards of conduct, there is an integrated control system over the styles and procedures that regulate the relationship with customers and their representative associations.

CHAPTER III. CODES OF CONDUCT IN RELATIONS WITH SUPPLIERS AND PARTNERS

3.23 Selection of the supplier

Purchasing processes are based on seeking maximum competitive advantage for Enel, granting equal opportunities to each supplier; they are also based on pre-contractual and contractual behaviors focused on indispensable and reciprocal loyalty, transparency and collaboration.

Suppliers' performance guarantees the necessary quality standards and must reflect the commitment to adopt best practices, in terms of human rights and working conditions, occupational health and safety, environmental responsibility and respect for privacy and information security by design and by default.

In particular, Enel's people in charge of these processes must:

- Not deny anyone who meets the established requirements the opportunity to compete for contracts, adopting objective and transparent criteria in the selection of the list of candidates.
- Ensure sufficient competition for each tender, with an adequate number of companies.

Enel has a supplier registry, whose qualification criteria do not constitute a barrier to access.

For Enel, the following are reference requirements:

- Timely documented availability of resources, including financial resources, organizational structures, project capabilities and resources, know-how, etc.;
- The existence and effective implementation, in cases where Enel specifications call for them, of adequate management systems for the company;
- Good standing/reputability.

Enel requires its suppliers to comply with this Code of Ethics. In the event that the supplier, in carrying out its activity, adopts behaviors that are not in line with the general principles set out herein, Enel will have the right to take appropriate measures, including termination of the contract and exclusion from any further collaboration opportunity.

3.24 Selection of the partner

The selection of partners, carried out before entering into new business relationships in order to assess the reliability of the potential counterparty, is regulated by specific internal procedures, which seek to ensure consistency with the requirements of the Code of Ethics.

3.25 Integrity and independence in relationships

At Enel, relations with suppliers are governed by common principles and are subject to constant monitoring. Such relationships also include financial and advisory contracts.

Entering into a contract with a supplier must always be based on relationships of extreme clarity, in order to avoid possible forms of dependency. Therefore, by way of example and not exhaustively:

- It is not considered correct to induce a supplier to enter into a contract unfavorable to it, by suggesting that a more advantageous alternative contract may be available.
- Generally, long-term binding projects that involve short-term contracts requiring continuous renewals with price revisions are avoided.
- Special attention must be paid to the execution and management of contracts whose estimated amounts are particularly significant in relation to the supplier's turnover.
- Relations with the counterparty must be maintained with the legal representative or their delegate.

To guarantee maximum transparency and efficiency of the purchasing process, periodic rotation of the people in charge of purchasing is encouraged, and the following is also established:

- The separation of duties between the unit requesting the supply and the unit entering into the contract.
- Adequate documentation of the decisions made.
- The preservation of information and official tender and contractual documents for the periods established by current regulations.

Finally, to guarantee transparency in relationships, Enel carries out – when conditions are met – a review of the ownership structures of its own suppliers.

3.26 Protection of ethical aspects in orders

From the perspective of aligning procurement activity with the ethical principles adopted, Enel is committed to requesting, for special orders, social-type requirements (for example, through the introduction of specific sustainability parameters in awarding formulas).

Violations of the general principles of the Code of Ethics will result in the application of sanctioning mechanisms also aimed at avoiding crimes that could give rise to administrative liability for Enel.

To this end, specific clauses are established in individual contracts.

In particular, in contracts with suppliers, contractual clauses are introduced that provide for:

- The supplier's adherence to specific social obligations (for example, measures that guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, protection against child labor, or adherence to the Principles of the Global Compact).
- The possibility of resorting to control actions to verify compliance with these requirements.

CHAPTER IV. CODES OF CONDUCT IN RELATIONS WITH SOCIETY

3.27 Environmental Policy

Enel pursues objectives consistent with those that are strategic in environmental matters.

The protection of the environment and natural resources, the fight against climate change and the contribution to sustainable economic development are strategic factors in the planning, conduct and development of Enel's activities.

In order to take advantage of all possible synergies, the definition of environmental policy and its implementation are managed in a unified and coherent manner.

Such management:

- Defines environmental and sustainable industrial development policies.
- Develops guidelines for environmental policy action.
- Identifies indicators and ensures the monitoring and control of the development of the company's actions regarding environmental impact.
- Monitors the evolution of national and international environmental legislation and establishes application references for subsidiaries.
- Manages relations with entities, institutes and agencies in the environmental field, promotes, carries out and coordinates agreements and programmatic arrangements with such parties and institutions.

Each group company internally contemplates relevant professional roles and/or operational structures in relation to specific tasks and issues.

3.28 Strategy and tools of the Environmental Policy

Enel's environmental policy is also based on the awareness that the environment can represent a competitive advantage in an increasingly broad and demanding market in terms of quality and behavior.

Enel's strategy is based on an approach to investments and activities that respond to the principles of sustainable development; in particular:

- Allocating a significant share of investments to energy production from renewable sources and grid resilience, also with a view to adapting to climate change.
- Promoting, within national and international bodies and programs, actions and behaviors that consider the conservation of the environment and its natural capital to be strategic.

Enel promotes the following environmental policy tools:

- Environmental management systems, certified according to the international ISO 14001 standard, which are committed to the continuous improvement of environmental performance and organization.
- Digitalization of processes and data management to guarantee a system for tracking and reporting environmental data, while ensuring control over the performance of the various industrial activities.
- Consultation and voluntary agreements with environmental and sectoral institutions and associations.
- Environmental awareness-raising and training activities for Enel's people, in order to internally disseminate initiatives and increase professional skills and competencies.
- Programs for the rational use of energy aimed at customers.
- Promotion of environmental sustainability practices among suppliers, contractors, customers and partners

3.29 Environmental communication

Annually, Enel reports on the implementation of environmental policy and the consistency between objectives and results achieved through the publication of the sustainability report:

- The main environmental objectives and results (energy efficiency, development of renewable sources, water protection and use, emissions reduction, biodiversity protection, soil protection and waste management, etc.).
- The most important environmental events and/or projects (for example: environmental management system certifications, facility upgrades, voluntary agreements, various types of initiatives for the protection of the environment and territory).

Enel is committed to allowing access to environmental information, in compliance with industrial confidentiality requirements.

3.30 Economic relations with political parties, trade union organizations, and associations

Enel does not finance political parties and organizations in Chile or abroad, nor their representatives or candidates, nor does it sponsor conferences or events for the exclusive purpose of political propaganda. It refrains from putting pressure, directly or indirectly, on political figures (for example, by granting the use of its facilities, accepting hiring recommendations, or advisory contracts).

Enel does not make contributions to organizations with which a conflict of interest may arise (for example, to trade unions, environmental or consumer protection associations); however, Enel may cooperate, including financially, with such organizations on specific projects based on the following criteria:

- Purposes attributable to Enel's mission.
- Clear and documentable allocation of resources.
- Express authorization from the functions responsible for managing such relationships.

3.31 Institutional relations

Relations with Chilean or international institutions are developed exclusively through forms of communication to assess the implications of legislative and administrative activity for Enel, to respond to informal requests and inspection actions (inquiries, questions, etc.), or in general to make Enel's position on relevant issues known.

To this end, Enel is committed to:

- Establishing, without arbitrary discrimination, stable communication channels with all institutional counterparts at the international, community or territorial level.
- Representing the interests and positions of subsidiaries in a transparent, rigorous and coherent manner, avoiding collusive behavior.

In order to guarantee maximum clarity in relations, contacts with institutional counterparts occur exclusively through representatives who have received explicit authorization.

Enel adopts specific organizational models for the prevention of crimes against public administration.

3.32 Relationships with stakeholders

Enel attaches strategic importance to dialogue with associations for the proper development of the business; it therefore establishes a stable communication channel with associations representing stakeholders, in order to cooperate while respecting mutual interests, present Enel's positions and avoid possible situations of conflict.

To this end, Enel:

- Guarantees a response to observations from all associations.
- When possible, is committed to informing and involving relevant associations on issues affecting specific categories of stakeholders.

3.33 Sponsorships and contributions

Enel supports, through the instruments offered by current legal regulations (such as, for example, voluntary contributions, sponsorship activities or specific agreements), initiatives that may relate to current affairs, energy transition, sustainability, sports, culture, and scientific and technological dissemination.

In choosing such initiatives, Enel pays special attention to any possible conflict of interest of a personal or business nature (such as, for example, family relationships with stakeholders or ties with bodies that, by virtue of their duties, could favor Enel's activity in any way), as well as to relevant corporate policies and procedures, including to ensure consistency, transparency and compliance with applicable regulations.

Sponsorships

Sponsorship activities must comply with corporate policies and procedures and promote the Group's brand, Values and services at the international, national and local level.

Contributions in support of activities of general interest

Enel S.p.A., together with other Group companies, has created Enel Cuore Onlus, a non-profit association fully supported by the same companies, whose objective is to pursue the common good, protecting the affirmation of the rights and dignity of the person, favoring their participation, inclusion and full development, reducing inequalities and valuing their growth and employment potential. In addition, Enel S.p.A. has also created the Fondazione Centro Studi Enel, fully supported by Enel S.p.A. and other companies of the Enel Group, whose objective is to promote and increase education, and to promote research, information and the dissemination of knowledge on energy, socioeconomic, sustainable development and innovation topics at the national and international level.

Enel S.p.A. and the other Group companies therefore contribute to activities of general interest in the areas mentioned above, mainly through support for Enel Cuore Onlus and the Fondazione Centro Studi Enel, which, in managing relations with third parties, adhere to the same principles contained in Enel's Code of Ethics. Likewise, at the national level, this is reflected, for example, in support for the Fundación San Ignacio del Huinay.

3.34 Antitrust and regulatory bodies

Enel adopts a set of initiatives, organizational measures and procedures to guarantee full compliance of the Company's activities with Competition Law. Enel complies with sector regulations and adheres to antitrust law in all its activities.

Enel pays the utmost attention to responding to requests for information from Competition Defense Authorities and Regulatory Authorities, without denying, manipulating or delaying the data transmitted, and maintains full and loyal cooperation during inspections and investigations.

Enel intends to guarantee that all activities, both its own and those of the companies it controls, are carried out in accordance with competition defense rules and sector regulations, and requires its employees, at all levels of the organization, to strictly comply with them in carrying out their activities.

To guarantee maximum transparency, Enel is committed to avoiding situations of conflict of interest involving employees of any Authority and their family members.

3.35 Personal data protection authority

Enel collaborates with the relevant data protection authorities through the Data Controller, who, through the designated Data Protection Officer, is responsible for liaising with the authority and managing the procedures necessary for the proper handling of personal data in accordance with Group policies and applicable data protection regulations.

3.36 Fair, responsible, and transparent tax management

Enel has provided the Group with a tax strategy, understood as the set of principles and guidelines inspired by values of transparency and legality, to guarantee a fair, responsible and transparent tax contribution in all the Countries where it operates, specifically highlighting the importance it places on the tax variable and its role in the sustainable development of society.

4 METHODS OF ACTION

4.1 Responsibilities of the audit function

The audit function has the following responsibilities assigned to it:

- Verify the application and observance of the Code of Ethics through an analysis and evaluation of the internal control and risk management system, with oversight of business processes that present significant impacts on business ethics.
- Monitor the application of the Code of Ethics and oversee initiatives to disseminate knowledge and understanding of it.
- Receive and analyze reports of violations of the Code of Ethics.

These activities are carried out with the support of the Company's relevant Functions, which have free access to all documentation deemed useful.

4.2. Communication and training

Stakeholders, internal and external, become acquainted with the Code of Ethics through specific communication activities (for example, distribution of the Code to all personnel, publication of dedicated sections on the corporate Intranet and website, the introduction of specific clauses in all contracts, etc.).

All corporate functions are responsible for promoting the continuous improvement of ethics and initiatives to disseminate knowledge and understanding of the Code of Ethics.

In order to ensure a correct understanding of the Code of Ethics for all Enel people, the People and Organization function designs and implements a training plan aimed at fostering knowledge of ethical principles and rules.

4.3 Reports by stakeholders

The Group's internal and external stakeholders may report, even anonymously, any violation or suspected violation of the Code of Ethics through a single platform accessible from the Group's [website](#).

The platform allows reports to be submitted in the following ways:

- in writing, via the web;
- verbally, by telephone;
- or, at the reporting party's request, through an in-person meeting scheduled within a reasonable time, through the channels indicated above.

The Audit function receives and analyzes reports in accordance with applicable regulations.

Enel ensures its commitment to monitoring that no act of retaliation is carried out on the basis of a report, understood as any act that could give rise to even the mere suspicion of a form of discrimination or penalization, nor any conduct, act or omission, whether or not imposed or threatened, that causes or could cause unjust harm to the reporting person, directly or indirectly.

Likewise, the confidentiality of the reporting party's identity will be guaranteed, without prejudice to legal obligations.

4.4 Violations of the Code of Ethics

The Audit Function reports violations of the Code of Ethics discovered as a result of reports from stakeholders or audit activity, and related proposals for corrective actions:

- To the Directors' Committee, where applicable.
- To the corporate bodies of companies directly and indirectly controlled by Enel, for matters within their competence.

The measures resulting from the verification of violations are defined by the competent corporate structures in accordance with applicable national regulations.

4.5 Review of the Code of Ethics

Internal Committees evaluate any proposed modifications or additions to the Code of Ethics and submit them for approval by the Board of Directors of Enel Generación Chile S.A.

