



ZERO TOLERANCE FOR CORRUPTION PLAN

November 2025



All Enel stakeholders may report any breach or suspected breach of the Zero Tolerance Plan against Corruption through the following means:

- In writing, through the online reporting system available at the following [link](#);
- Verbally, by contacting by telephone the numbers indicated on the aforementioned website;
- Through an in-person meeting, at the reporting party's request, which will be scheduled within a reasonable timeframe through the channels indicated above.

1 GENERAL PRINCIPLES

Enel reaffirms its commitment to the principles set out in its Code of Ethics and to the commitments undertaken by adhering to the United Nations Global Compact¹. Within this framework, it requires its personnel to act with honesty, transparency and integrity in the performance of their duties. These same principles extend to all other stakeholders, that is, the individuals, groups and institutions that contribute to the fulfillment of its mission or that are involved in its activities.

In line with the tenth principle of the Global Compact, according to which "businesses should work against corruption in all its forms, including extortion and bribery," Enel has signed up to the Partnering Against Corruption Initiative (PACI)². This initiative promotes the adoption of transparency criteria recommended by Transparency International. Through this membership, Enel ratifies its commitment to the ten principles of the United Nations Global Compact, a commitment that is reiterated at the Conference of the Parties (Conference of Parties) held annually under the auspices of the United Nations³.

This commitment, which forms an integral part of the Enel Group's Compliance Program, is set out in the following general principles:

- Enel Generación Chile S.A. rejects all forms of corruption, whether direct or indirect.
- Enel Generación Chile S.A. implements an anti-corruption program known as the "Zero Tolerance Plan against Corruption" (hereinafter, the TCC Plan).
- Enel Generación Chile S.A. adopts management systems in accordance with the highest international standards, aligning them with local legislative frameworks.

2 TCC PLAN: COMMITMENTS

Based on an analysis of the activities most exposed to corruption risk, Enel Generación Chile S.A. undertakes the following commitments in the performance of its activities:

2.1 Bribery and other benefits

Enel Generación Chile S.A. prohibits the use of any form of unlawful payment, whether by monetary or other means, aimed at obtaining any advantage in its relations with its stakeholders⁴, it being understood that the concept of "advantage" includes preferential treatment or the guarantee of obtaining benefits otherwise due.

Naturally, this prohibition also applies to employees who, by virtue of their duties and the activities they perform at Enel Generación Chile S.A., seek to accept and/or offer bribes for their own benefit or that of family members, associates or acquaintances.

1 Action program promoted by the United Nations in July 2000 at the initiative of the Secretary-General, to involve the business community in a new form of collaboration with the United Nations through adherence to 10 universal principles concerning human rights, labor protection and environmental protection (www.unglobalcompact.org).

2 This is adherence to the initiative sponsored by the World Economic Forum entitled "Partnering Against Corruption Initiative", involving international companies active in sectors including energy, construction and mining (www.weforum.org).

3 Communication on Progress to the United Nations Global Compact, signed annually, confirming Enel's commitment to the 10 principles of the Global Compact.

4 Anything representing an advantage for a person, whether material or moral, financial or otherwise, considered relevant according to common practice and belief.

2.2 Gifts, hospitality and benefits⁵

Enel does not permit any form of gift, hospitality or benefit that could be construed as exceeding customary business courtesy practices or that, in any case, is intended to secure preferential treatment in the conduct of activities related to the company.

In particular, it is expressly prohibited to offer or accept gifts, hospitality or benefits — whether directly or indirectly — to or from public officials, auditors, Enel directors, or members of oversight and control bodies, when these could compromise independent judgment or induce the guarantee of any type of advantage.

This prohibition is absolute and admits no exceptions, even in those countries where such practices are customary in the business sphere. The rule applies both to benefits promised or offered and to those received.

Every gift, hospitality item or benefit offered or received must meet the following criteria:

- Not be motivated by the intent to exert undue influence nor by the expectation of reciprocity;
- Be reasonable given the circumstances;
- Be appropriate and in line with generally accepted standards of professional courtesy;
- Be occasional in nature;
- Be of low economic value.

Likewise, such acts must not compromise the integrity or reputation of either party, nor be capable of being construed as aimed at obtaining undue advantages.

Enel refrains from engaging in any practice not permitted by applicable law or accepted business practice.

Enel's institutional gifts are intended for brand promotion purposes. Their distribution must be managed and authorized in accordance with the company's internal policies and procedures, and must be duly documented.

2.3 Conflict of interest

In carrying out any activity, real, potential or apparent situations that could give rise to a conflict of interest must be avoided.

A conflict of interest is considered to be any situation in which a secondary interest — whether of an economic, financial, family or other nature — could influence, or appear to influence, the impartiality of business decisions or the performance of the duties and responsibilities assigned to a person associated with Enel.

Likewise, a conflict of interest is considered to exist when representatives of customers, suppliers or public institutions act, in their dealings with Enel, contrary to the fiduciary duties inherent to their position.

⁵ See also the Enel Group in Chile Policy on Gifts and Hospitality.

2.4 Donations to political parties

Enel Generación Chile S.A. refrains from exerting any form of unlawful pressure, whether direct or indirect, on politicians; it does not finance political parties, their representatives or candidates, whether in Chile or abroad; nor does it sponsor any event whose sole purpose is political propaganda.

2.5 Sponsorships and contributions

Enel supports initiatives related to current affairs, energy transition, sustainability, sports, culture, and scientific and technological outreach, using the instruments provided for under current law, such as voluntary contributions, sponsorship activities, or the execution of specific agreements.

In selecting these initiatives, Enel pays particular attention to preventing potential conflicts of interest, whether personal or corporate — for example, family relationships with stakeholders or ties with entities that, owing to the functions they perform, could in some way favor Enel's activity. Enel likewise ensures compliance with internal policies and procedures, guaranteeing consistency, transparency and compliance with applicable regulations.

Sponsorships

Sponsorship activities must comply with corporate policies and procedures and must be aimed at promoting the brand, values and services of the Enel Group at the international, national and local levels.

Contributions to support activities of general interest

Enel S.p.A., together with other Group companies, has established Enel Cuore Onlus, a non-profit association fully funded by those companies. Its purpose is to promote the common good by protecting people's rights and dignity, fostering their participation, inclusion and comprehensive development, reducing inequalities and enhancing their personal and professional growth.

In addition, Enel S.p.A. has created the Fondazione Centro Studi Enel, also fully funded by Enel S.p.A. and other companies of the Enel Group, with the aim of promoting education and fostering research, information and the dissemination of knowledge on energy, socioeconomic, sustainable development and innovation matters, both nationally and internationally.

Enel S.p.A. and the other Group companies thus contribute to the development of activities of general interest in the areas mentioned above, primarily through support for Enel Cuore Onlus and the Fondazione Centro Studi Enel, which, in managing their relations with third parties, are governed by the same principles established in Enel's Zero Tolerance Plan against Corruption (TCC Plan). Likewise, at the national level, this is reflected, for example, in support for the Fundación San Ignacio del Huinay.

3 TCC PLAN: APPLICATION

Compliance with Enel Generación Chile S.A.'s anti-corruption commitments requires the involvement of stakeholders in the plan's implementation activities.

3.1 RELATIONS WITH THIRD PARTIES

3.1.1 Extraordinary transactions, controlled, related and partner companies

- In acquisition, merger or divestment transactions, or in the context of defining any partnership relationship with third-party companies, Enel Generación Chile S.A. verifies that the minimum conditions necessary to comply with the TCC Plan are met.
- Subsidiary and associated companies' Boards of Directors are requested by Enel Generación Chile S.A. to adopt the Code of Ethics and the TCC Plan through the relevant resolution.
- Enel Generación Chile S.A. proposes that subsidiary and associated companies that do not have codes of ethics or anti-corruption programs adopt its Code of Ethics and this TCC Plan or, alternatively, draw up a similar document.

3.1.2 Agents, consultants and intermediaries

- Any person acting on behalf of Enel Generación Chile S.A. is required to sign a declaration undertaking to comply with the provisions of the Code of Ethics and the TCC Plan.
- Fees paid are duly justified based on the task performed and prevailing market practices at the time.
- Corresponding documentation is filed to ensure the utmost accuracy, transparency and traceability of contractual relationships.
- Should conduct by counterparties that breaches the TCC Plan be detected, Enel Generación Chile S.A., within legally established limits, will apply the measures it deems appropriate, including contract termination and the loss of other potential collaboration opportunities.

3.1.3 Purchasing and sales procedures

- Enel Generación Chile S.A. carries out its purchasing and sales procedures correctly and transparently.
- Internal procedures include appropriate controls to ensure the transparency and accuracy of the supplier selection process, as well as the management and execution of the corresponding contract.
- During the selection process for potential suppliers, their commitment to acting in accordance with the principles of the Code of Ethics and the TCC Plan is assessed.
- Should conduct by counterparties that breaches the TCC Plan be detected, Enel Generación Chile S.A., within legally established limits, will apply the measures it deems appropriate, including termination of the contractual relationship and the loss of other potential collaboration opportunities.

3.2 HUMAN RESOURCES

- The evaluation of personnel to be hired is based on the match between candidates' profiles and business needs. Enel adopts measures to prevent any form of nepotism or favoritism during selection and hiring processes, within the limits of available information. During hiring processes, selected candidates are required to sign a declaration undertaking to comply with the provisions of the Code of Ethics and TCC Plan

- All internal documents related to personnel management will refer to the provisions of the TCC Plan.
- In the event of a breach of the TCC Plan, Enel Generación Chile S.A. applies the sanctions provided for under the company's internal regulations to offending employees, including those in managerial positions, in accordance with collective bargaining agreements and the procedures and laws in force in the countries where Enel Generación Chile S.A. operates.

3.3 TRAINING

- Training activities will be developed for all personnel, with the aim of ensuring the dissemination and understanding of Enel's commitment to the fight against corruption.
- The principles, commitments and implementation procedures form an integral part of in-depth training sessions specific to each professional group.
- External stakeholders are provided with the material and expertise necessary to develop their own anti-corruption plan.

3.4 COMMUNICATION

The TCC Plan is communicated to personnel through internal communication tools.

A copy of the TCC Plan is made available to all personnel.

Contracts entered by Enel include an informational note on the adoption of the TCC Plan.

The TCC Plan is available to all interested parties on the official website www.enel.com.

3.5 REPORTS BY STAKEHOLDER

Stakeholders, both internal and external to the Group, may report — even anonymously — any violation or suspected violation of the TCC Plan through a single platform accessible from the Group's website ([link](#)).

The platform allows reports to be filed by:

- Written submission, through the online system;
- Telephone, using the numbers indicated on the website;
- In-person meeting, at the reporting party's request, scheduled within a reasonable timeframe through the aforementioned channels.

The Audit function receives and analyzes reports in accordance with applicable regulations. Enel guarantees that no retaliation will be taken against those who submit reports in good faith. Retaliation is understood to mean any act that may involve, even indirectly, discrimination, penalization or unjust harm toward the reporting party. Likewise, the confidentiality of the reporting party's identity is ensured, except where legally required otherwise.

If, as a result of a report, a violation of the principles of the TCC Plan is confirmed, the procedures set out in the Code of Ethics will be activated.

3.6 CONTROL ACTIVITIES

3.6.1 Internal Control System and Risk Management

Enel's Internal Control and Risk Management System (SCIGR, per its Spanish acronym) consists of the set of rules, procedures and organizational structures aimed at the effective and efficient identification, assessment, management and monitoring of risks, including corruption risk.

The commitment to fighting corruption is undertaken by all people who are part of Enel. Each organizational unit is responsible, within its area of competence, for establishing appropriate control systems for the implementation of the Zero Tolerance Plan against Corruption (TCC Plan).

3.6.2 Responsibilities of the Audit Function

The Audit function is assigned the following responsibilities:

- Verify the implementation and compliance of the TCC Plan through the analysis and assessment of the SCIGR, with particular attention to business processes that have a significant impact on corporate ethics;
- Oversee the implementation of the TCC Plan and monitor information and training initiatives on the fight against corruption;
- Receive and analyze reports of possible violations of the TCC Plan. These activities are carried out with the support of the relevant business functions, with free access to all documentation deemed relevant.

3.7 Review of the Zero Tolerance Plan Against Corruption

Internal Committees evaluate any proposed amendments or additions to the TCC Plan and submit them to the Board of Directors of Enel Generación Chile S.A. for approval.