

## **Enel X UK Limited Modern Slavery and Human Trafficking Statement**

Fiscal Year ending 31<sup>st</sup> December 2023

UK Modern Slavery Act of 2015

The United Kingdom's Modern Slavery Act 2015 requires that businesses supplying goods and/or services in the United Kingdom report annually on the policies and practices utilised to prevent human trafficking and slavery in their operations and supply chain. This Statement is posted pursuant to section 54(1) of the Act for Enel X UK Limited's fiscal year ending 31<sup>st</sup> December 2023.

### **Our Business**

Enel X UK Limited ("Enel X UK") is a leading provider of demand response and related solutions. These solutions unlock the full value of energy management for industrial and commercial (I&C) organisations, including the reduction of real-time demand for electricity.

Enel X UK's business model is focused on professional services and digital solutions, and, as such, we rely sparingly on suppliers. Despite this lower overall risk of unethically-sourced labour, Enel X UK is proud to issue this statement to enumerate the steps that we have taken to mitigate the threat of slavery and human trafficking as part of our business and supply chain.

### **Our Commitment**

Enel X UK has opposed and continues to oppose slavery and human trafficking in all aspects of our business. We encourage all employees to comply with the laws and regulations in all countries in which they operate. As part of this process, Enel X UK emphasizes to its employees the importance of the Enel X UK Corporate Code of Conduct and Ethics ("Code of Conduct"), which requires adherence to all applicable laws and regulations. Each employee receives a copy of the Code of Conduct when he or she is hired, and every year thereafter.

Enel X UK provides an anonymous ethics hotline for its employees to safely call attention to ethical issues they may observe or perceive. As part of the Code of Conduct, we encourage employees to utilise this confidential hotline to relay any concerns. This hotline is independently operated and overseen.

### **Our Supply Chain**

Enel X UK has opposed and continues to oppose slavery and human trafficking in all aspects of our supply chain. Enel X UK will not support or deal with any business knowingly involved in slavery or human trafficking. Enel X UK encourages and requires all employees

and third-party suppliers to comply with the laws and regulations in all countries in which they operate. Enel X UK requires all individuals or entities acting on its behalf to know, understand, and abide by all applicable laws and regulations, including employment laws.

Our procurement process includes actively screening all third-party suppliers using an industry recognised, regularly-updated tool to determine whether that supplier is included on the Office of Foreign Assets Control sanctions lists and to determine whether that party is otherwise included on a denied-party list. Furthermore, the Company performs periodic reviews of existing customers, agents, consultants, joint venture partners, and other third parties using our restricted-party screening tool.

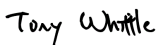
To ensure our high ethical standards, our subcontracts include a warranty from our subcontractors that they will abide by all relevant regulations and policies, including applicable health, safety, and employment laws. Furthermore, Enel X UK is in the process of updating its agreements templates to require subcontractors to represent and warrant that they do not use slave labour. We will further require all new subcontractors to represent and warrant they comply and will continue to comply with the principles outlined in the United Nation's Universal Declaration of Human Rights.

## Our Future

As part of its continued commitment to ethical behaviour, Enel X UK is in the process of reviewing its supply-chain protocols, and is considering the ratification of a Supplier Code of Conduct to more clearly relay Enel X UK's specific ethical standards with respect to our suppliers' behaviour. Enel X UK will review its policies on preventing slavery and human trafficking annually.

If you have an ethical or legal concern, please reach out to our Company at [enelxuk@enel.com](mailto:enelxuk@enel.com).

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Tony Whittle

Managing Director, Enel X UK Limited