



Enel Green Power Canada, Inc.
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Report Pursuant to the Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains

RESPONSE OUTLINE

About this report.....	2
Structure, activities and supply chains.....	2
Policies and due diligence processes in relation to forced labour and child labour	4
Forced labour and child labour risks	6
Measures taken to remediate forced labour or child labour.....	7
Training provided to employees on forced labour and child labour.....	7
Assessing effectiveness.....	8
Approval and attestation	8
Appendix I	9

About this report

This is an annual report by Enel Green Power Canada and its Canadian subsidiaries (See [Appendix 1](#)) in order to comply with the *Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”) for the period covering January 1 to December 31, 2023. Note that the policies and descriptions contained herein are applicable to Enel Green Power Canada, Inc. and its subsidiaries (hereinafter “Enel Green Power Canada” or “Enel”).

Structure, activities and supply chains

STRUCTURE AND ACTIVITIES

Enel Green Power Canada is an independent power producer corporation whose core business is the operation of renewable energy power stations in Canada. It operates four wind farms, representing an asset base with a net installed capacity of 371 MW¹ in Canada. Enel Green Power Canada is currently developing a portfolio in wind, all of which are guided by its corporate values and shared value priorities. A significant portion of Enel Green Power Canada’s business is conducted through its subsidiary entities holding project assets.

The following lists the principal operating subsidiaries and their associated Canadian business number during fiscal year 2023, a full list of subsidiaries can be found in [Appendix I](#):

- Enel Alberta Wind Inc. (830252557 RT0001)
- Castle Rock Ridge Limited Partnership (801004755 RT0001)
- Pincher Creek Limited Partnership (791631716 RT0001)
- Riverview Limited Partnership (792331688 RT0001)
- Wild Run Limited Partnership (739755718 RT0001)

Our purpose and vision

Our vision to tackle some of the world’s biggest challenges aims to create an electric, clean energy future where everyone thrives. We empower sustainable progress, with the goal to leave no one behind leading a just energy transition accessible to all.

¹ As of December 31, 2023.



In our journey to 2030, we want to enable **electrification** and supply **sustainable** energy taking care of people and the environment. Sustainability means value for all the people involved. That's why we develop strong relationships with the people of consumers, partners, investors, institutions, and local communities. With them:

- We build **trust** fostering a continuous and constructive dialogue.
- We **act responsibly** joining forces across generations to fight climate change.
- We **grow together** through collaboration and innovation, becoming a partner of choice.
- We **act proactively** pioneering change through an open mindset.

Compass

The compass that guides us to our destination

Our Compass helps us move in the right direction during this journey. It's a compass that's based on Enel's four values: Trust, Responsibility, Innovation and Proactivity, and it consists of 4 Mindsets and 12 Behaviors:

Win together

- Be passionate.
- Create bonds of trust.
- Share your thoughts.

Empower and take ownership

- Be committed.
- Lead through kind leaders.
- Care & grow.

Keep it simple, fast and smart

- Be prepared & flexible.
- Communicate to engage.
- Focus on the essential.

Go beyond

- Be bold.
- Be persistent & resilient.
- Be curious, humble & innovative.

SUPPLY CHAINS

Supply chains play a pivotal role in Enel Green Power's operations. The components purchased are used to build and operate wind assets in Alberta.

In 2023, our supply chain is comprised of

- Renewable energy project developers associated with the initial site acquisition for a project;
- Construction contractors associated with the construction of renewable power plants;
- Various consultants associated with the planning and development of a renewable energy plant project;
- Various suppliers of components for the renewable energy plants, including companies specializing in wind turbines, main power transformers and major components.

The main countries where these companies' suppliers are located is indicated in parentheses:

- Wind turbine manufacturing (China, India, Germany, Turkey, United States)

We have a Human Rights Due Diligence management system to assess if risks are managed in an effective and balanced way by the company's various business units and functions. All employees across every unit, function and level of the organization have a responsibility to manage risk as part of our internal control and Risk Management System (ICRMS).

Policies and due diligence processes in relation to forced labour and child labour

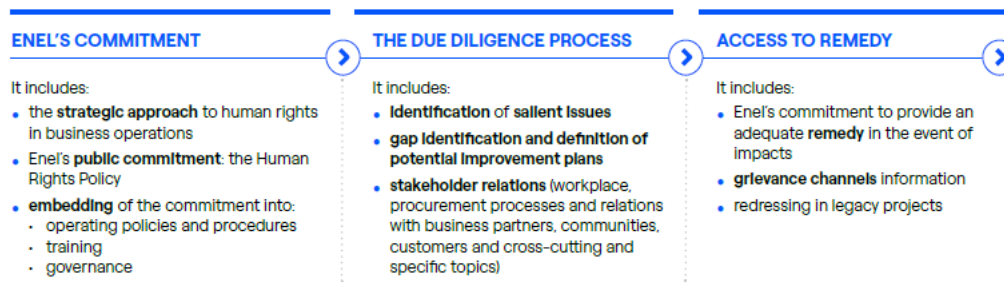
POLICIES AND PROCESSES IMPLEMENTED

At Enel, our pledge to respect human rights is the guiding principle that permeates all our activities, and it is fully integrated into our corporate purpose and values, since we belong to the territory, and we are an essential element in the lives of people, businesses, and society at large. We require our contractors, suppliers, and commercial and financial partners to adhere to the same principles. Promoting the respect of Human Rights is a fundamental element to empower sustainable progress.

The International Charter of Human Rights together with the International Labour Organization (ILO) conventions underlying the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy define the human rights that Enel applies to business practice. Enel's commitment also takes into account:

- the 10 principles of the Global Compact, to which it signed up as an active member in 2004;
- the letter of commitment, signed by Enel in 2019, in which the United Nations called on companies around the world to commit to a just transition and the creation of decent jobs;
- the United Nations' "Protect, Respect and Remedy" framework set forth in the Guiding Principles on Business and Human Rights;
- the OECD Guidelines for Multinational Enterprises.

Enel's human rights management system is based precisely on the three pillars of the UN Guiding Principles:



Enel is committed to respecting and promoting internationally recognized workers' rights in all countries where it operates. This means rejecting practices such as modern slavery, forced labor and human trafficking, whether within the Company or along the value chain in which it operates.

We have implemented tools and processes in place to support our commitment to procure responsibly and fulfil our human rights obligations, including those applicable to each of the following groups.

Our suppliers

Enel's Qualification is the process of vendors screening to determine those that will become approved suppliers. For each defined Merchandise Group (category of supplies, services, works) minimum requirements are established for the following areas: Technical; Economic-Financial; Environment; Health & Safety; Human Rights; Legal; and Ethics.

SUPPLIER QUALIFICATION PROCESS

Enel has adopted a qualification system to identify suppliers who meet the requirements necessary to cooperate with the Company. Supplier qualification is organized by commodity categories called Product Groups (PGs)². Enel Green Power Canada's process undertakes a qualification pathway for one or more PGs based on supply goods and services. The assessment process varies depending on the level of risk (high, medium or low) associated with the PG for each issue (technical, safety, environmental, reputational aspects, etc.). In addition, regardless of the risk level of PGs, checks are carried out on legal/reputational, environment, economic-financial, and sustainability. Within sustainability the completion of a questionnaire on all sustainability topics is required, specifically:

- **Health and safety:** the "Safety Self-Assessment" is required, as it informs suppliers in a straightforward way of the fundamental requirements on which to work and grow together;
- **Environment:** on a scale of 1 to 3 (1=worst; 3=best, respectively), different environmental criteria are evaluated depending on the relevant PG and its associated level of risk;
- **Human rights:** through the use of a questionnaire regarding how the supplier manages labor practices (such as rejection of forced or child labor and respect for diversity) and community relations (local, indigenous and tribal peoples).

As of December 31, 2023, 100% of qualified suppliers were assessed according to social, environmental and safety criteria.

Contract language

Enel has defined specific clauses which are updated periodically in all works, services and supply contracts so as to take into account different regulatory adjustments and align with international best practices.

The General Terms and Conditions of the Contract stipulate that suppliers, subcontractors, sub-suppliers, third parties and the entire supply chain involved comply with the applicable wage, contribution, insurance and tax regulatory conditions with respect to all workers employed in any capacity in the performance of the contract.

In addition, compliance with the principles set forth in the International Labour Organization (ILO) Conventions and legal obligations regarding the protection of child and women's labor, equal treatment, prohibition of discrimination, abuse and harassment, freedom of trade unions, association and representation, rejection of forced labor, safety and environmental protection, and sanitary conditions are explicitly required. In the event a conflict between the above legal obligations and the ILO Conventions, the more restrictive rules shall prevail. The clauses further stipulate that suppliers, subcontractors, sub-suppliers, third parties, and the entire supply chain involved, must commit to prevent all forms of corruption (Art. 29.1.5 of the General Terms and Conditions of the Contract).

In addition to the legal provisions, the contractual conditions require that suppliers:

² Product Group (PG): specific category of goods/works/services that Enel purchases. The qualification process and related verifications that Enel carries out vary depending on the level of risk associated with each PG. There are 4 risk components: technical, safety, environmental, and reputational. The risk of each component is assessed according to type of goods/works/services (and related activities) and the country context.

- Recognize the “ten principles” of the United Nations Global Compact and declare that they manage their business activities and operations in order to meet these fundamental responsibilities in the fields of human rights, labor, the environment and the fight against corruption (Art. 28 of the General Terms and Conditions);
- Acknowledge the commitments Enel has made in the principles listed in the documents below and refer to them in the execution of the contract: the Human Rights Policy, which includes a principle related to respect for the environment and biodiversity; the Code of Ethics, in which the value of fair competition is also promoted through abstention from collusive, predatory behavior and abuse of dominant position; Zero Tolerance of Corruption Plan, and global models of criminal risk prevention (Art. 29.1.1 of the General Terms and Conditions of the Contract);
- Adopt suitable conduct to avoid the emergence of conflicts of interest throughout the duration of the contract and undertake to notify Enel promptly in writing if any such circumstances arise. Enel reserves the right to carry out any control and monitoring activity to check compliance with the obligations set out above by both the supplier and any of its sub-contractors, sub-suppliers, third parties of the contractor and the entire supply chain involved, and to terminate the contract if violations are ascertained.

Our employees

Through Enel’s Human Right’s Policy, all employees commit to respect Human Rights, and specifically the salient ones strictly connected to our value chain, defined in the Human rights policy following the outcome of our 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”. In addition, our recently updated [Code of Ethics](#), along with mandatory annual ethics training for all employees, and strategic management of our purchases.

Furthermore, stakeholders – whether internal or external - believing a violation might have occurred, may resort to the dedicated [EthicsPoint](#) for Enel as reflected in our Code of Ethics and Human Rights policy.

Forced labour and child labour risks

Enel Green Power Canada recognizes the importance of the Forced Labour and Child Labour Act and has taken the following steps to assess if risks of Modern Slavery practices are accounted for and identified in its operations and policies. The Audit Function systematically and independently assess the effectiveness and adequacy of Enel’s internal control and risk management system and supports the company’s organizational structures in monitoring risks and identifying risk mitigation actions. The Audit function:

- assesses risks and update the Audit risk assessment, jointly with the relevant process owners; and
- prepares the yearly risk-based audit plan.



Enel identifies 37 different types of risk divided into 6 categories - Financial, Strategic, Operational, Compliance, Governance & Culture and Digital Technology. Among such risks the Audit Risk assessment includes:

- **Corporate culture & ethics:** Risk of incurring judicial or administrative sanctions, economic or financial losses and reputational damages as a result of attitudes and unsanctioned behaviors of employees and top management, in breach with ethical values of the Company. Risk of an inadequate integration, within business processes and activities, of the ethical principles defined by the Company. Risk arising from Company inability to put in place processes of enhancing human capital, to ensure the respect of diversity and equal opportunity principles, to properly manage the health and safety of its employees.
- **Health and Safety:** Risk that inappropriate working environments, structures, machineries, and business operations, may negatively impact on health & safety conditions of employees and other stakeholders involved.
- **Procurement, logistic & supply chain:** Risk of incurring reputational, economic or financial losses as a result of ineffective procurement or contract management activities, due to inadequate requirements definition or supplier qualification process, poor monitoring over the fulfilment of contractual duties.
- **Compliance:** Risk of incurring judicial or administrative sanctions, economic or financial losses and reputational damages as a result of a breach in complying with national or local laws and regulations.

While Enel has started the process of identifying risks, there are still gaps in the assessment of risks by activity type specific to forced labour or child labour.

Measures taken to remediate forced labour or child labour

Based on the mapping of our active suppliers, the identification of our key suppliers and the in-depth analysis to determine whether any of these suppliers present a higher risk of exposure to modern-day slavery, no known incidents or significant risks of modern-day slavery were identified. The issue of remediation is therefore not considered to be applicable at this time.

Training provided to employees on forced labour and child labour

During kick-off of activities for construction site teams and operations all on-site Enel staff and third-party suppliers and service providers undergo a training that addresses the zero-tolerance stance of Enel by rejecting child labor and forced labors, highlighting the respect for working time and work life balance.

Furthermore, in 2022 all employees were subject to mandatory training on human rights, inclusive of forced labour and child labour. The training has been discontinued and was not conducted in 2023. There is an opportunity to make the training mandatory year over year, and ensuring greater understanding on the relevance across activities.

Assessing effectiveness

A high degree of initiatives are in place to determine effectiveness of the efforts executed at Enel to ensure forced labour and child labour are not exercised through business activities. Nonetheless, we will continue to improve and refine our sourcing and identify risks across activities.

In 2023, we met our goal to have 100% of qualified suppliers were assessed according to social, environmental and safety criteria in the aim to elevate our position on zero tolerance for forced labour and child labour amongst our supply chain.

Every three years, Enel undergoes a four-step human rights due diligence process across the entire value chain. The process includes:

1. Assessment of risk perceived by key stakeholders, at the individual country level, with regard to labor, local community, and environment rights;
2. Gap analysis aimed at identifying and analyzing the organizational and risk control systems;
3. Development of action plans to cover any area of improvement identified by the previous step;
4. Monitoring of action plans and remedies.

We will continue to work closely with our employees and with our suppliers in the event that concerns are raised about the use of forced labour or child labour. Through the [EthicsPoint](#) 24/7 hotline and website anyone can anonymously report their concerns.

Approval and attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Paolo Romanacci
Head of USA and Canada



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Appendix I

Enel Green Power Canada, Inc. subsidiaries

Company Name	Business #
Enel Green Power Canada, Inc./Enel Energies Renouvelables Canada, Inc.	134333137 RT0002
Enel Alberta Wind, Inc.	830252557 RT0001
Castle Rock Ridge Limited Partnership	801004755 RT0001
Pincher Creek Limited Partnership	791631716 RT0001
Riverview Limited Partnership	792331688 RT0001
Lone Pine Limited Partnership	790140081 RT0001
Enel Green Power Hadros Wind Limited Partnership	760546481 RT0001
Enel Green Power Elkwater Wind Limited Partnership	751485889 RT0001
Buffalo Jump Limited Partnership	739751113 RT0001
Wild Run Limited Partnership	739755718 RT0001
Enel Operations Canada, Ltd.	738185313 RT0001
Enel Green Power Swift Wind LP	787304609 RT0001
Enel Green Power Elmsthorpe LP	786479204 RZ0001
Riverview Management Inc.	746867712 RT0001
Pincher Creek Management Inc.	746567718 RT0001
Enel Alberta Solar, Inc.	723715801 RC0001
Bold Elk Wind, LP	756460341 RC0001
Pearl Star Wind LP	794380618 RC0001
Emerald Crescent Solar LP	756448148 RC0001
Station Tales Solar LP	794375212 RC0001
Burgany Spruce Solar LP	794389213 RC0001
Checkerboard Plains Solar LP	787121417 RC0001
Stable Brook Storage Project LP	787117415 RC0001
Regal Rising Solar Project, LP	749303343 RC0001
Legacy Blossom Storage Project, LP	787118611 RC0001
Dappled Colt Storage Project LP	787120013 RC0001
Sun Rock Solar, LP	723715801 RC0001