

Code of Conduct





Introduction

1

1 Ethical Principles and Values

4

A - Ethical considerations in business management and entrepreneurial endeavors

5

B - Workplace ethics, employee safeguarding, and advancement

6

C - Dedication to sustainable development and social accountability

7

D - Principles

7

2 Code of Conduct

8

A – Business management and entrepreneurial ethics

9

B – Work ethics, employee protection, and promotion

22

C – Communication ethics and external relations

26

3 Implementation Standards

29

4 The ten principles of the Global Compact

32

This document constitutes a translation of the most recent version of the Code of Ethics of Edison S.p.A., dated July 2023, applicable to Edison Next Spain S.L.U. and its subsidiaries, with minor adjustments made as necessary to align with the specific realities and legislation relevant to Edison Next Spain S.L.U. and its subsidiaries.

Mission

The mission of Edison S.p.A. and its subsidiaries (hereinafter referred to as “Edison”) is to remain close to its customers by offering intelligent, competitive, and sustainable energy solutions for electricity, gas, and services.

Through this activity, Edison aims to:

to generate value for its shareholders and foster the long-term growth of the company;

- enhance the well-being and professional development of its employees;

To convey elements of innovation and promote economic and civil advancement within the community, while fully adhering to the fundamental values of ethics and transparency.

Structure

The Code of Ethics is comprised of four components:

- **Ethical Principles and Values** – The former represent the ethical principles to which Edison The Company is committed to these principles, which should inform its relationships with stakeholders and the communities in which it operates. These communities serve as the benchmarks that the Company, in alignment with the Principles it upholds and in accordance with its Mission, has specifically identified to direct the daily actions of its employees in managing business activities.

- **Rules of Conduct** - These are standards of behavior aimed at groups of

Interest in the development of various business activities, wherein the guidelines and standards to which Edison Collaborators must adhere are established to uphold the Ethical Principles and mitigate the risk of unethical behavior.

- **Implementation Standards** - Outline the functionality of the operational procedures.

for revising the Code of Ethics and addressing violations, with the objective of overseeing its implementation and adherence.

- **The ten principles of the Global Compact** - The Global Compact, originating from an initiative

Promoted by the United Nations in 1999, its objective is to foster the establishment of a global economy that upholds ten principles concerning human rights, labor conditions, environmental sustainability, and the fight against corruption, through the engagement of companies, particularly large enterprises.

Validity and Applicability

The Code of Ethics is applicable to Edison S.p.A and its subsidiaries, both in Italy and internationally, and is thus binding on the conduct of all collaborators associated with these entities. This includes all individuals who, in any capacity and irrespective of the nature of their contractual relationship, contribute to the attainment of the company's goals and objectives (individuals with employment contracts or other forms of contractual collaboration).

Edison is dedicated to ensuring adherence to the principles of this Code by all entities (including affiliated or related companies, partners, customers, suppliers, professionals, and other categories of external agents) with whom it engages to fulfill its objectives.

The Code of Ethics is applicable both in Italy and internationally, notwithstanding the cultural, social, and economic diversity of the various countries in which Edison operates, along with any necessary adaptations mandated by the specific legislation of each country.

The Code of Ethics serves as the foundational element of Edison Next Spain S.L.U.'s Criminal Compliance, Anti-Bribery, and Anti-Competition System, functioning as both a constituent element and an integral component. Consequently, any violation of the principles and rules outlined in this Code may result in significant repercussions and prompt the implementation of the appropriate measures established by the company.

Edison's dedication to the dissemination, implementation, and revision of the Code of Ethics.

Edison commits to all individuals engaged in the application of this Code to:

- ensure its prompt dissemination, making it accessible to all and execute suitable training programs;
 - ensure its regular review and updating to align with its evolution of social consciousness, ecological circumstances, and prevailing regulations;
 - furnish suitable support tools to provide clarifications on the which pertains to the interpretation and implementation of the provisions of the Code of Ethics;
 - implement a suitable sanctions framework concerning potential violations.
 - implement suitable protocols for reporting, investigating, and managing potential infractions;
- to safeguard the confidentiality of the whistleblower's identity in the event of a potential breach, without prejudice to legal obligations and professional safeguards;
- Regularly assess adherence to the Code of Ethics.

Employee commitments to adhere to the Code of Ethics.

The Code of Ethics constitutes a fundamental component of the contextual responsibilities inherent in the employment relationship.

All collaborators, therefore, commit to:

- to conduct oneself in alignment with the Code of Ethics;
- report any breach of the Code of Ethics immediately upon becoming aware of it;
- collaborate in the definition and execution of internal processes designed to deliver implementation of the stipulations of the Code of Ethics;
- Consult your supervisor or the appropriate authorities regarding the components of the Code of Ethics that may necessitate interpretation or elucidation.



Ethical Principles and Values



Edison's Ethical Principles include:

- A - Ethics in business management and commercial operations
- B - Ethics of labor, stewardship, and advancement of team members;
- C - Dedication to development sustainability and social responsibility
- D - Values.

A – Ethical considerations in business management and entrepreneurial endeavors

Legality – All Collaborators are required to adhere to the applicable laws and regulations of the countries in which they operate, the Code of Ethics, and internal company policies, applying them with integrity and fairness.

Integrity – In its interactions with third parties, Edison is dedicated to Edison is devoted to ethical and transparent practices, refraining from disseminating misleading information or engaging in conduct that takes advantage of vulnerabilities or ignorance. Edison is committed to fostering equitable business relationships with third parties, cultivating enduring connections with customers and suppliers, and ensuring proper acknowledgment of its employees' contributions.

Edison is dedicated to combating fraud and corruption in all their manifestations.

Loyalty – Engagements with external parties, the collaborative partnerships and relationships

Among the latter, they must be grounded in the highest loyalty, defined as fidelity to one's word, promises, and agreements, as well as responsible action and the embrace of a stance of complete good faith in every activity or decision.

Transparency – All actions undertaken by Edison and its relationships with stakeholders and shareholders must be executed with a commitment to the accuracy, integrity, consistency, and timeliness of information, in compliance with legal standards, best market practices, and within the parameters established to safeguard the company's proprietary knowledge and assets.

Respect for human dignity
Individuals Edison honors rights.

Edison champions fundamental human rights, safeguarding moral integrity and ensuring equal opportunities. Discriminatory conduct based on political or union affiliation, religion, race, ethnicity, nationality, age, sex, sexual orientation, health status, or any other inherent personal characteristic is deemed unacceptable in both internal and external relations. Edison regards diversity as a vital catalyst for innovation and development, fostering dialogue and the exchange of opinions, ideas, and experiences. Edison stands firmly against all manifestations of racism and xenophobia.

Edison is committed to ensuring that, within the scope of its operations, the rights enshrined in the "Universal Declaration of Human Rights" are upheld in the various countries where it conducts business.

B – Work Ethics, Safeguarding, and Advancement of Collaborators.

Commitment to enhancement - The

Employees endeavor to furnish the Society with their utmost professional expertise and to perpetually enhance it through the training and development resources provided by the company.

Confidentiality - Collaborators commit to regarding all information acquired during their work as confidential.

Treat employment as confidential and, consequently, refrain from disclosing it except to the extent necessary for the advancement of the aforementioned activity, while adhering to the principle of transparency.

All external communication of confidential and "price-sensitive" information is conducted under the supervision of designated departments.

Loyalty and conflict avoidance

interests The collaborators ensure

All conduct is predicated on criteria of loyalty to the company, with each commercial decision made for the benefit of the organization. Consequently, individuals must avoid any situations that may lead to conflicts of interest between their economic, personal, or familial activities and their positions within Edison, as such conflicts could compromise their independence of judgment and decision-making.

Safety and health protection

employment conditions Edison posits that

Motivated and professionally adept individuals serve as the essential strategic lever for competing and advancing within their respective businesses.

Working conditions and an environment that safeguard the psychophysical integrity of individuals while fostering initiative, creativity, participation, teamwork skills, and the assumption of responsibilities, all while respecting the need for balance between professional and personal life.

Equal opportunities - The

Professional development and employee management are grounded in the principles of fairness and equal opportunity. Acknowledgment of accomplishments, managerial capabilities, and exhibited professional competencies serve as the fundamental criteria for career progression and salary enhancements, facilitated by ongoing and systematic market comparisons that ensure transparency in evaluation and communication methods. Edison actively prevents, deters, and addresses any occurrences of injustice or discrimination in the workplace, as well as any instances of bullying, violence, or harassment.

Professional Development - Edison SE endeavors to equip all employees with suitable resources and opportunities for professional development.

Act ethically - Edison mandates that its employees adhere to the principles and values outlined in the Code of Ethics.

Right to communicate breaches

Edison guarantee Every employee involved in a situation that contradicts the principles and values outlined in the Code of Ethics has both the right and the obligation.

to communicate confidentially and without fear of reprisals to the Head of Compliance or to the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries, in accordance with the procedures outlined in the Implementation Rules, further elaborated in the "Protection of Informants" procedure.

C – Dedication to sustainable development and social responsibility

Advancing sustainable development -

Edison regards environmental protection as a core value and is confident in the compatibility of "business development" with the respect for and advancement of both the environment and the community. Edison is thus dedicated to adhering to current regulations and employing the best available technologies to enhance the development of its activities focused on valuing natural resources, safeguarding the environment for future generations, and promoting initiatives that broadly protect the environment and the territories in which it operates.

Protection of cultural heritage and landscape

Edison safeguards the Historical, artistic, cultural, and landscape heritage, both domestic and international. To this end, the Society is committed to safeguarding and preserving movable and immovable assets of cultural and landscape importance, ensuring their integrity, identity, and functional efficacy in accordance with existing legislation.

Edison actively supports initiatives designed to enhance the preservation and understanding of cultural and landscape heritage.

Responsibility toward the community Edison functions by maintaining in

It considers the needs of the community in which it operates and contributes to its economic, social, and civic development.

D – Values


Our actions and decisions are guided by respect for individuals and all stakeholders within the organization, as well as by a commitment to responsibility and integrity.

RESPECT. *"We hold in high regard our employees, customers, shareholders, the community, and the environment in which we function. For us, enhancing the quality of life and advancing society is an obligation."*

INTEGRITY. *"We aspire to merit the"*

"We cultivate the trust of all our collaborators by honoring our commitments, acting with integrity and transparency, and accepting accountability for our actions."

RESPONSIBILITY. *"Energy is not merely a commodity; its generation, transmission, and sale are marked by significant public interest. This entails substantial responsibility and the adherence to well-defined ethical values."*



Code of Conduct

2



Without prejudice to the Ethical Principles outlined in the initial section, the following rules are presented to delineate the behaviors to be adhered to in the execution of various business activities, ensuring that the established Ethical Principles are upheld.

The behavioral rules are organized based on the subjects involved in the relationships and the specific objects, and are delineated in the following chapters:

Edison's Ethical Principles include:

A - Ethics in business management and of commercial operations;

B - Professional Ethics, Stewardship, and Advancement of the Contributors;

C - Ethics of Communication and the external relations.

A – Ethical considerations in the management of business and entrepreneurial endeavors

Edison conducts its operations by implementing the Ethical Principles outlined in this Code and mandates that its Employees and business partners comply with its provisions under all circumstances, irrespective of the significance of the business or market conditions. All collaborators and business partners are specifically required to implement a "zero tolerance" policy concerning fraud and corruption in all its manifestations.

Shareholder Engagement

Edison engages in ongoing communication with the shareholder community, particularly honoring the laws and regulations that ensure each investor or prospective investor has the right to access the same information necessary for making informed investment decisions.

Edison safeguards and promotes the interests of the Company and its Shareholders, consistently considering the specific interests of each Shareholder or group of Shareholders.

Edison thus commits to:

- **to formally notify the Shareholders**

and to prospective shareholders regarding any action or decision that may significantly impact their investment. Specifically, Edison S.p.A. guarantees:

the availability on the website www.edison.it of press releases and notices at the expense of the Company corresponding to the exercise of rights associated with the issued securities, of the periodic financial documents prepared by the Company, as well as the information and documents pertaining to the Shareholders' meetings;

- that Edison Next Spain S.L.U. possesses of an email address and a contact telephone number (<https://edisonnext.es/>)

- **Uphold a system of governance**

Corporate governance is conducted in accordance with the prevailing regulations and the Corporate Governance Code, to which Edison has voluntarily committed, as well as the internationally recognized best practices.

- **to ensure to Shareholders the**

availability, with adequate advance notice, of the documents prepared by the Board;

- guarantee the consistent involvement of The Administrators in the board's operations;
- to ensure systematic progress and the operation of the Boards, honoring the fundamental right of each shareholder to seek clarifications on the various matters under consideration and to articulate their views;
- ensure efficient frameworks and designated departments focused on Shareholder Relations.

Internal Control and Control Systems

Risk Management

Edison regards a robust Internal Control and Risk Management System as a crucial component of its organizational culture, one that enhances the efficiency and effectiveness of business operations, and ensures that employees are well-informed and aware.

The Internal Control and Risk Management System is defined as a collection of rules, procedures, and organizational structures designed to facilitate a robust management of the company through an effective process of identifying, measuring, managing, and monitoring the primary business risks, ensuring alignment with established objectives.

An efficient Internal Control and Risk Management System contributes to the assurance of:

- the preservation of social heritage; the efficiency, effectiveness, and
- cost-efficiency of business operations;

- the dependability and precision of the financial statement of information;
- respect for the laws and regulations regulations.

The participants in the Internal Control and Risk Management System are diverse. The Board of Directors is accountable for its design, setting the guidelines, and periodically assessing its appropriateness and operational effectiveness with the support of the Control and Risk Committee or equivalent entities within its subsidiaries.

The chief executive officer or the appointed individual/entity in each subsidiary, in accordance with the responsibilities assigned for overseeing the effectiveness of the Internal Control and Risk Management System, executes the directives of the Internal Control System and is accountable for the identification, assessment, and management of principal risks.

The responsibility for ensuring the proper and effective functioning of the Internal Control and Risk Management System lies with all Edison employees, varying by their specific roles. Division, Business Unit, and Management Managers bear direct responsibility for adopting the guidelines provided by Senior Management and executing the Board's directives, with the objective of ensuring the effective operation of the Internal Control and Risk Management System within their respective areas of responsibility.

The Ethics and Compliance Committee, established by the Board of Directors, supports both the Board and business management in fulfilling their responsibilities concerning the Internal Control System and Risk Management, by verifying and assessing the

The appropriateness and efficacy of the overall operation of the Internal Control and Risk Management System. It provides an annual report on its activities to the Board of Directors.

The functioning of the Internal Control and Risk Management System relies on the effective coordination of various control levels, including line checks, first-level monitoring activities, second-level monitoring activities, and audit activities.

To ensure a sufficient level of the Internal Control System, Edison is committed to:

- **Ensure the Corporate Governance system operates effectively for** that ensures adherence to current regulations and aligns with the recommendations and standards outlined in the Corporate Governance Code;
- **Sustain the Control System** updated, aligning it with the evolution of the business and relevant internal and external regulations;
- **consistently monitor the** suitability and effectiveness of the operation of the Internal Control System;
- **to ensure efficiency and effectiveness, and** sufficient resources for the Compliance Department and the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries;
- **establish a process for awareness and** Training designed for employees to cultivate an appropriate culture regarding Internal Control, Risk Management, and Corporate Governance at all levels.

Enterprise Risk Management and Operational Procedures

Edison has established a comprehensive Enterprise Risk Management (ERM) model that is intricately connected to the strategic planning process. Its primary aim is to employ a systematic approach to identify the company's key risks, proactively evaluate their potential adverse effects, and implement suitable mitigation strategies. To achieve this, Edison has introduced an Enterprise Risk Model, a risk assessment methodology, and a series of procedures that oversee internal processes, regulating activities conducted within individual functions as well as interactions with other entities.

Transparency in the Accounting Information Statement and Financial Communication

Edison recognizes the significance of transparency, accuracy, and integrity in accounting information and financial communication, including balance sheets, periodic reports, and informational brochures. The organization is committed to maintaining a dependable administrative-accounting system that accurately reflects management activities and provides the necessary tools to identify, prevent, and manage, to the greatest extent possible, financial and operational risks, as well as fraud that could adversely affect the Company.

All transactions must be grounded in sufficient documentation and be reasonably verifiable.

All accounting entries that serve as the foundation for the preparation of the annual accounts must be recorded clearly, truthfully, and accurately, and retained.

meticulously by the business entities responsible for its formulation.

Edison S.p.A., in pursuit of its objectives and in accordance with the regulations established to safeguard savings (Law 262/2005), which imposes a series of specific obligations and responsibilities on companies with publicly traded shares concerning the preparation of accounting documents and financial communications mandated by law and disseminated in the market, has implemented an Accounting Control Model that aligns with these principles.

All employees must work to ensure that management information is represented accurately and promptly, and that the implemented Accounting Control Model fulfills all the aforementioned objectives.

Transparency and adherence to tax regulations

Edison denounces all forms of tax evasion and avoidance, advocating for and implementing tax management strategies designed to minimize the risk of noncompliance with tax regulations or conflicts with the principles and objectives of tax systems. This approach aims to prevent tax disputes while fostering a transparent relationship and dialogue with the tax authorities in the countries where it operates.

In particular, Edison S.p.A. has implemented a tax risk management system ("Tax Control Framework").

focused on guaranteeing the accurate and prompt execution of tax obligations and, more broadly, adherence to the tax regulations relevant to the Group.

All Collaborators agree to adhere to current regulations and to conduct themselves in a manner that guarantees tax returns accurately and comprehensively reflect the situation.

Prevention of money laundering.

Edison commits to avoiding the use of his economic system by all means. financial for purposes associated with money laundering, self-laundering, and/or the financing of terrorism (or any other illicit activity).

To this end, it guarantees that the operations in which it engages do not, even potentially, facilitate the receipt, replacement, or reuse—whether in economic or financial activities—of money, goods, and/or other benefits derived from illicit activities.

Furthermore, the Company prohibits any transactions that obstruct the accurate identification of the origin of funds, assets, and other benefits. Consequently, Edison meticulously verifies all available information concerning business counterparties, suppliers, partners, and advisors to assess their reputation and the legitimacy of their activities prior to forming any business relationship or collaboration with them.

Edison categorically disavows relationships with counterparties that are deemed to be, or merely suspected of being, engaged in any form of criminal activity.

gender, along with counterparts whose credibility and/or professional reliability cannot be substantiated.

Edison emphasizes the utilization of alternatives to cash for payment receipt. Edison consistently adheres to anti-money laundering regulations in every jurisdiction in which it operates.

Relations with the Audit Firm

Auditors, whether internal or external, must have unrestricted access to the data, documents, and information required to perform their duties.

To ensure the highest level of respect for its independence and impartiality, Edison pledges to the external auditor and to other companies within the same network to:

- not to confer mandates that are incompatible with

the financial audit;

- to refrain from granting service mandates that may undermine independence and objectivity.

Furthermore, individuals who have engaged in the audit of a company's annual accounts, including those with management and supervisory roles, as well as the partners and directors of the auditing firm assigned to audit the subsidiary companies of this entity or those that control it, are prohibited from holding corporate positions within the administrative and control bodies of the company that granted the audit mandate, or in any company controlled by it or that exerts control over it.

Nor may they offer services as self-employed individuals or subordinate employees for those companies executing pertinent management functions, unless there is

after a minimum period of three years has passed since the expiration or revocation of the mandate, or since they have ceased to be partners, directors, or employees of the auditing firm and its subsidiary companies or those that control it.

Relationships with Affiliated Entities

Edison's Corporate Governance framework emphasizes the significance of related party transactions, which must be executed in alignment with the principles of objectivity, transparency, and integrity, as well as in accordance with the internal business procedures established by the Board of Directors.

Client Relations

Edison is dedicated to fulfilling the highest and most legitimate expectations of its customers by providing quality products and services under competitive conditions, while adhering to regulations intended to safeguard competition and the market. In the context of its customer relationships, all Edison employees pledge to:

- Implement internal protocols to managing relationships with customers to achieve the objective of fostering and sustaining positive, long-term connections;
- not to discriminate arbitrarily against their clients nor attempt to exploit their position to their detriment;
- operate within the parameters of the laws and of the existing regulations;
- consistently honor the commitments and obligations undertaken in relation to clients;
- embrace a customer service approach characterized by efficiency, collaboration, and courtesy;
- furnish precise information, complete and accurate, enabling the client to make an informed decision;
- Uphold honesty in communications advertising or alternative forms;
- urge clients to comply with the principles outlined in this Code of Ethics and incorporate, where applicable, an explicit obligation to adhere to them in contracts.
- Notify the Head immediately.
Any customer behavior that violates the Principles must be reported to the Compliance Committee or the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries.
Ethics of the Code, in alignment with the modalities outlined in the Implementation Standards.

To fulfill these commitments, Edison has established a Management System and a Commercial Quality policy designed to promote and sustain:

the emphasis on the external customer and

internal through ongoing enhancement of the product/service offered;

- the continual enhancement of efficiency and the effectiveness of the processes;
- the promotion of a culture of Quality to all levels of the organization.

Supplier Relations

Suppliers are essential to enhancing Edison's overall competitiveness. Consequently, those selected are distinguished by their exceptional attributes in professionalism, quality, innovation, cost, service, reliability, and commitment to ethical business practices. Edison employees must choose suppliers in accordance with the Ethical Principles outlined in this Code. They are also encouraged to foster and sustain fair, transparent, and collaborative relationships with suppliers while consistently acting in the company's best interests.

Specifically, employees of Edison, particularly those engaged with suppliers, must:

- Adhere to internal protocols for the selection and management of supplier partnerships;
- refrain from discriminating against suppliers, permitting all individuals who fulfill the criteria to vie for contract awards via candidate selection

- based on objective, explicit, transparent, and verifiable criteria;
- **secure the partnership of the suppliers** to consistently ensure the optimal balance among quality, cost, and delivery timelines;
 - **to operate within the parameters of the laws and of existing regulations**
 - **Implement the conditions outlined in the contract;**
 - **foster a genuine and transparent dialogue** with suppliers, in accordance with industry standards;
 - **Confirm the accurate and thorough execution** of the service rendered by the accountable supplier, prior to approving payment of the invoices submitted by the supplier
 - **Notify your superior officer of** any discrepancies identified during the execution phase of the service and/or potential payment requests not anticipated in the purchase order and/or in the contract initially formalized with the supplier;
 - **Avoid situations of excess** dependence for both Edison and the supplier;
 - **solicit that suppliers** adhere to the principles outlined in this Code of Ethics and incorporate into contracts, as stipulated in the procedures, the explicit obligation to comply with them;
 - **Notify the Head immediately.**

Any actions by a supplier that may violate the Ethical Principles of the Code, in accordance with the procedures outlined in the Implementation Rules, can be reported to the Compliance Committee or the Ethics and Compliance Committee of Edison Next Spain S.L.U.

Import/export activities and adherence to international regulations.

The importation and exportation of Products and technologies is conducted by Edison in compliance with regulations contemporary, even transnational. Edison pays particular attention to the verification of its potential nature of “dual use,” to ensure its accurate classification and management, and prevent the potential for sanctions.

Edison also pledges that the importation and exportation of Products and technologies are developed adhering to the laws and conventions international accords on embargoes and control of the exports/imports in relationship with the nations to which these They pertain to.

Relationships with Other External Entities.

To the external entities that position themselves in Contact Edison (experts) external consultants, agents/officers, representatives, intermediaries, and others are requires adherence to the principles established in This legislation.

All of Edison's associates, in terms of their functions, they must:

- **Adhere to internal protocols** for the identification and management of relationships with external entities that collaborate with the company;
- **meticulously assess the feasibility of** resort to alternative external subjects;
- **select only counterparties that possess** sufficient professional credentials and standing;
- **acquire from other external entities** that collaborate with the Company to ensure ongoing adherence to the most advantageous balance among service level, quality, cost, and deadlines;

- to operate within the parameters of the laws and of existing regulations
- Implement the conditions outlined in the contract; specifically, the compensation must be adjusted solely according to the performance outlined in the contract, and payments may not be made to any party other than the contractual counterparty or in a country other than that of the parties or the performance of the contract;
- Confirm the accurate and thorough execution of the service rendered by the external party, prior to authorizing payment of the invoices they have issued;
- Notify your superior officer of any discrepancies identified during the performance phase or potential payment requests not anticipated in the originally established agreement;
- foster a genuine and transparent dialogue with external partners, in alignment with sound business practices
- request that other external parties collaborating with the company adhere to the principles outlined in this Code of Ethics and incorporate, when stipulated in the procedures, an explicit obligation to comply within contracts;
- promptly notify the Head of *Compliance or the Ethics and Compliance Committee of Edison Next Spain* S.L.U. and its subsidiaries address any actions by external parties collaborating with the company that violate the Ethical Principles outlined in the Code, in accordance with the procedures established in the Implementation Rules.

Partner relationships

The intricacy of the business landscape increasingly necessitates Edison's involvement in initiatives that entail collaboration with other firms. This engagement occurs both through the establishment of joint ventures with one or more partners and through the acquisition of equity in companies alongside other shareholders.

In implementing these initiatives, all Edison employees are required to comply with the Ethical Principles outlined in this Code. Specifically, they must:

- cultivate relationships solely with associates or other partners who maintain a strong reputation, engage solely in lawful activities, and are guided by ethical principles akin to those established by Edison;
- ensure that the partnership or the joint venture functions in compliance with the Code of Ethics.
- Ensure that no partner is overlooked. unjustly advantageous treatment concerning their contribution;
- to ensure the transparency of the agreements and refrain from entering into clandestine pacts or agreements that contravene the law;
- cultivate authentic relationships, open and collaborative with stakeholders;
- Promptly inform the compliance officer, in accordance with the procedures outlined in the Implementation Rules, of any actions by the holding company, joint venture, associate, or partner that may potentially violate the Ethical Principles of the Code.

Relations with Public Administration
Among the entities encompassed by Public Administration, all State administrations must be acknowledged, including Institutes and Educational Centers across all levels and grades, Educational Institutions, State-Owned Enterprises and Administrations with autonomous status, Regions, Provinces, and Municipalities, Mountain Associations along with their consortia and associations, University Institutions, autonomous Social Housing Institutes, Chambers of Commerce, Industry, Crafts, and Agriculture along with their associations, as well as all national, regional, and local non-economic public bodies, administrations, enterprises, and entities of the regional Health Service.

In a broader context, the concept of public administration includes all entities, such as private concessionaires of public services tasked with delivering public services, public enterprises, and public law entities as defined by community terminology, which are required to operate, depending on the scope of their activities, within the framework of a public function.

Relations with the Public Administration, public bodies, or similar entities that are part of the Italian State, Community states, and foreign entities, as well as with all individuals classified as “public officials” or “in charge of a public service,” are reserved exclusively for the relevant and/or authorized business functions, adhering to the

adhering to principles of conduct:

No employee of Edison should

promise or pay monetary sums, promise or provide goods in kind or other advantages to public officials in a personal capacity to advance or favor the interests of Edison S.p.A. and/or one or more of its subsidiary companies, even as a consequence of unlawful pressure;

No employee of Edison is permitted to

Circumventing the aforementioned provisions by utilizing alternative forms of assistance or contributions that, under the pretense of sponsorships, commissions, consultancies, advertising, etc., serve the same purposes previously prohibited. • No Edison Collaborator shall engage with a public official (Italian or foreign) or assist them in acting contrary to their official duties to promote or favor the interests of Edison S.p.A. and/or one or more of its subsidiaries;

• **In any event, no Contributor**

the company may unduly influence the decisions of the public institution engaged in any capacity;

• **each Collaborator who receives**

If you receive directives to proceed in this manner, you are required to promptly inform the individual responsible for compliance, in accordance with the procedures outlined in the Implementation Standards.

• **in discussion with his colleagues**

Every Edison Collaborator will consistently avoid boasting or highlighting their personal connections with representatives of the Italian or foreign Public Administration, whether acquired for professional or extramural reasons, and will refrain from claiming non-existent relationships.

- **in dealings with the Administration**

Edison is publicly dedicated to consistently acting in good faith and with a sense of responsibility, honoring commitments and adhering to legal provisions.

Within the confines and in accordance with the provisions of the law, Edison establishes specific modalities and responsibilities for the operational management of sponsorship processes.

Relationships with individuals summoned to provide testimony before the Judicial Authority in a criminal proceeding.

It is forbidden to exert any form of influence over any individual, whether an employee of the company or a third party, who is summoned to provide testimony before the Judicial Authority, for the purpose of advancing the interests of the company or otherwise securing an advantage for it, which may be utilized in a criminal proceeding.

In particular, all collaborators of Edison are prohibited from:

- **to persuade any individual, by** violence, threats, offers, or promises of monetary or other advantages, to provide false statements to the Judicial Authority, with the intent of promoting societal interests or securing some benefit for it; accepting money or other advantages for the purpose of delivering false statements or even refraining from testifying before the Judicial Authority;
- **to act with the intent of influencing** any manner in the conduct of individuals summoned to provide a statement before the Judicial Authority.

Relations with Supervisory Authorities and Regulatory Bodies

Edison commits to fully and diligently adhere to the regulations established by the Supervisory Authority, ensuring compliance with current laws pertinent to its operations. Furthermore, it pledges to foster its relationships with authorities and Supervisory Bodies through utmost collaboration and complete respect for their institutional roles, committing to promptly implement their directives.

In particular, all Edison employees, in the context of their responsibilities, must:

- **Adhere to internal protocols** for the management of relationships with independent authorities and regulatory bodies;
- **embrace a behavioral approach in** relationship with the Supervisory Authorities and other regulatory bodies founded on efficiency, collaboration, and courtesy, adhering to each request in the execution of their inspection functions and cooperating in the associated instructional procedures;
- **furnish precise information,** comprehensive and accurate to facilitate an informed decision;
- **Notify the Head immediately.**

Any actions by the external collaborator that violate the Ethical Principles of the Code, in accordance with the procedures outlined in the Implementation Rules, must be reported to the Compliance Committee or the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries.

Relations with representatives of political entities and relevant associations

Representatives of political forces are defined as individuals who occupy institutional roles or positions within political parties and movements.

Representatives of relevant associations are defined as individuals who occupy institutional roles or positions within organizations, including professional associations, trade unions, environmental organizations, and similar entities.

In interactions with these categories of individuals, no Employee should promise or disburse monetary sums, offer or provide goods in kind, or extend other benefits on a personal basis to promote or favor the interests of Edison S.p.A. and/or any of its subsidiary companies, even under unlawful pressure.

No Edison Collaborator may evade the aforementioned provisions by seeking alternative forms of assistance or contributions that, under the pretense of sponsorships, commissions, consultancies, advertising, etc., serve the same purposes previously prohibited.

However, various forms of collaboration may be pursued to facilitate the execution of events or activities, including the conduct of studies, research, conventions, seminars, and more.

Relations with competitors and adherence to antitrust regulations

The liberalization of the energy sectors, in which Edison operates, has resulted in the establishment of a genuine energy market and has facilitated the implementation of overarching regulations designed to safeguard competition.

To elucidate and refine specific principles and regulations, with a particular focus on national and international competition protection laws, Edison has implemented internal Antitrust regulations, which aim to achieve the following objectives:

- to provide to

Collaborators offer definitions and interpretations of the relevant regulations, along with the implementing provisions of the Code.

- **Identify the domains of Edison's endeavors** that may be at risk of non-compliance violations;
- **ascertain the actions or behaviors** that may contravene competition protection regulations.

Management of Confidential Information

“Confidential Information” constitutes a vital component of the company's assets and, therefore, requires appropriate protection. “Confidential Information” refers to any information related to Edison that is of a confidential nature and, if disclosed without authorization or inadvertently, could potentially harm the Company or its affiliates. Concerning Confidential Information, the term “Privileged Information,” as delineated by EU Regulation No. 57/2014 of the Parliament and of the Council dated 16 April 2014 (Market Abuse Regulation), holds particular significance.

Inside Information is governed by specific regulations and legal provisions regarding its management and public disclosure. Consequently, an appropriate internal procedure is established to maintain the confidentiality and internal management of Confidential Information and Inside Information until potential market disclosure, while also ensuring compliance with regulatory requirements.

Data protection and privacy

“Personal data” refers to any information pertaining to an identified or identifiable natural person, even indirectly, through reference to any other information, including a personal identification number.

In the course of its operations, Edison gathers this information primarily to:

- acquiring or delivering services;
- the evaluation of business risk;
- the identification of target demographics or

market segments.

To ensure the protection of personal data, Edison, through its Collaborators, commits to processing such data in compliance with applicable regulations and, specifically, according to the following criteria:

- **transparency for data subjects**
personal data, individuals possess the right to be informed about the personal information collected regarding them, the purposes for which it is gathered, and whether such information will be disclosed;
- **legality and appropriateness of the treatment;**
- **significance of the treatment for the objectives**

declared and pursued, in that personal data shall not be utilized for secondary purposes without the consent of the concerned party (unless legally mandated otherwise);

the disclosure of data to third parties does not

may be conducted without the consent of the interested party (unless it pertains to a situation where the law does not mandate it);

- **Assurance of quality and precision of**
the information;
- **the stakeholder's right to consult**
and request the correction if needed.

Safeguarding the informant's confidentiality

Edison safeguards the confidentiality of all individuals who, in accordance with prevailing regulations, report potential violations of the Code of Ethics, existing regulations and procedures, and/or actions that may constitute crimes and offenses to which Edison Next Spain S.L.U. and its subsidiaries could be vulnerable.

The recipients of the communications are bound by the highest standards of confidentiality regarding the informant, as well as complete confidentiality concerning the information received and the data acquired as a result of the communication.

Safeguarding the informant from discriminatory actions or retaliation

Edison safeguards the informant against discriminatory actions and/or reprisals resulting from the communications made.

In the event of experiencing retaliation and/or discrimination, the informant may reach out to their immediate superior or the Head of Compliance, or the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries, as outlined in the Internal Information System Policy.

Workplace environment and safety.

Edison is guided by the principle that all employees and third parties accessing the workplace should be afforded the opportunity to work in comfortable and safe environments. Furthermore, the environment is regarded as a valuable asset that must be protected for the benefit of all, including future generations and the company itself.

Consequently, Edison conducts its operations with a commitment to excellence in environmental protection and the health and safety of its employees and third parties, aiming for the continuous enhancement of its outcomes in this domain.

With that objective in mind, Edison:

- is dedicated to fulfilling the current regulations regarding health, safety, and the environment;
- Formulates and disseminates guidelines for the implementation of environmental protection and health and safety protocols that Edison S.p.A. and its subsidiaries are required to adhere to;
- encourages the involvement of Collaborators of the workers' representatives in the realm of risk prevention and protection of

environment and safeguarding the health and safety of themselves, their colleagues, and third parties;

- advocates for initiatives in the field Environmental initiatives designed to foster sustainable development.

To execute the principles outlined in its environmental and safety policy, Edison:

- implements management systems certified standards for environmental, safety, and quality assurance;
- conducts and revises evaluations of risks to devise comprehensive health and safety protection measures for its employees and third parties accessing its workplaces, ensuring their well-being;
- It pertains to ongoing education and promoting awareness among management and all staff regarding environmental and safety concerns;
- employs prequalified suppliers for quality, safety, and environmental considerations promote collaboration and coordination to mitigate risks associated with interference and enhance awareness of environmental and occupational health and safety matters;
- with and the institutions to foster equitable and transparent relationships; Communities, and transparent relationships;

It employs the most advanced technologies to mitigate risks at their origin and minimize environmental impacts.

- employs analytical instruments of the incidents to ascertain their root causes and avert recurrence;
- Formulate and implement a program of internal audits to assess the effectiveness and efficiency of environmental and safety management systems;
- publishes on an annual basis and provides access The Sustainability Report and the Environmental Report are accessible on the website, featuring results and performance indicators related to environmental, health, and safety domains.

B - Work Ethics, Employee Protection and Advancement **Recruitment and onboarding of personnel**

The hiring process addresses the necessity of acquiring knowledge and expertise in the market that are currently lacking within the company, as well as the imperative to recruit young individuals in whom to invest, ensuring the organization's growth and development.

The recruitment and selection of personnel to be hired fall under the purview of the People & Talent Department of Edison Next Spain S.L.U. This process is conducted with respect for candidates' privacy and is based exclusively on objective and transparent criteria, ensuring equal opportunities and the elimination of favoritism.

As part of the new employee integration process, a specialized program focuses on the recruitment of recent graduates.

All employees are engaged under a standard employment contract in compliance with the relevant legislation governing the workplace; any form of irregular employment or "black market work" is strictly prohibited.

At the time of hiring and throughout the initial onboarding period, each employee is provided with detailed information specifically regarding the regulations governing their employment relationship, the safety and health prevention protocols in the workplace, company policies, and the guidelines outlined in Edison's Code of Ethics. This approach aims to facilitate immediate understanding and promote a swift integration into the company's culture and environment.

Professional advancement and education

Edison recognizes that the collaboration of highly motivated individuals with exceptional professionalism is a strategically vital factor.

Consequently, it is recommended to establish a cohesive and integrated human resources management and development system that provides all employees, under equitable conditions, with the same opportunities for advancement and professional growth.

The core component of the human resources management and development system is the assessment of demonstrated knowledge and potential knowledge, closely aligned with the present and future requirements of the organization, as well as the identification of roles.

The key to strategic development is a fundamental prerequisite for the allocation of positions of responsibility within the company's structure and for intentional and progressive professional and career advancement.

The professional development and advancement of all individuals are facilitated through internal mobility initiatives and professional and managerial training.

Management holds the primary responsibility for defining training investments and ensuring their execution, both by actively participating in the training process and by serving as a consistent role model for the transfer of knowledge and experience to the rest of the workforce. Edison values the expertise of its employees and encourages each employee to engage in continuous learning through their ongoing professional development.

Remuneration

Edison compensates its employees according to their responsibilities, professionalism, and performance, with the

aim of recognizing and rewarding the contributions of each employee and upholding a framework

of fair compensation. There is no global comparison whatsoever with competitive benchmark markets in which it operates. The remuneration system is systematic and

The establishment and revision of compensation, in accordance with ethical standards, prevailing legislation, contractual agreements, and meritocratic policies, are conducted through transparent and equitable instruments and methodologies, which are communicated to the Collaborators.

Annual remuneration comprises a fixed component, associated with the responsibilities and roles undertaken by the Collaborators and their level of professionalism, as well as a variable component, either individual or collective, tied to the results attained individually and/or the contributions made towards the achievement of the company's primary objectives.

Depending on the significance of the role undertaken, the annual compensation may be augmented with specific company bonuses, aimed at sustaining a competitive position in the global market.

Internal communication

Edison posits that internal communication is a vital structural component for the efficient operation of business processes and for encouraging the active integration and participation of all employees in the company's activities. It also facilitates the dissemination of values, strategies, and objectives among employees, the exchange of information and experiences, and the strengthening of a robust corporate identity and culture.

Internal communication is executed through the utilization of tools that are distinguished by their objectives, recipients, and content.

such as the business media, intranet, conferences, social gatherings, etc.;

Internal communication is facilitated and, in any case, coordinated by the relevant departments and the collaborators assigned specific responsibilities.

Internal communication is fundamentally the primary and direct responsibility of each manager, essential for the effective and ongoing management of interpersonal relationships with their team members. It occurs through instances of information exchange, attentive listening, and dialogue within both individual and group relationships.

Employee Engagement and Work-Life Integration

Edison regards employee motivation as a crucial competitive element in attaining business objectives.

To that end, it commits to promoting initiatives and services that enhance the quality of life for its employees and assist them in balancing the demands of the work environment with those of their personal lives.

Conflicts of Interest

All employees are required to ensure that every business decision is made in the best interests of Edison. Consequently, they must avoid any situations that may present a conflict of interest between personal or familial economic activities and their roles at Edison S.p.A. and its subsidiaries, as such conflicts could compromise their independence of judgment and decision-making.

If an employee encounters a situation that may constitute or indicate a conflict of interest, they must promptly notify their supervisor. The supervisor will then, in accordance with established procedures, inform the Head of Compliance or the Ethics and Compliance Committee to assess the actual presence of such a situation and determine the necessary intervention.

The following circumstances, among others, may lead to conflicts of interest:

- **to possess economic interests and**
 - financial (substantial shareholding, professional roles, etc.), including via family members, with suppliers, clients, or competitors;
- **to perform tasks, including on behalf of** family members, clients, suppliers, or competitors;
- **receiving money, gifts, or favors from** any individual, organization, or entity that currently has or plans to establish commercial relations with Edison;
- **Utilize the position you hold in the** company or information obtained in the execution of their duties in a manner that creates a conflict between their personal interests and those of the company;
- **purchase or divest shares (of Edison)** S.p.A. or its subsidiaries or external companies) when, in the course of their duties, they gain access to significant information that has not yet been made public. In all instances, the trading of securities or shares of Edison S.p.A. subsidiaries by individuals in strategic management positions must be conducted with complete transparency and precision, adhering to the information obligations required by the market.

Appropriate utilization of corporate resources

Every employee is accountable for safeguarding the company's resources entrusted to them and is obligated to promptly notify the appropriate authorities of any threat or incident that may harm Edison.

In particular, the Contributor is required to:

- **strive assiduously to safeguard the** company assets, through responsible practices in alignment with the established operating procedures governing their utilization;
- **avert the misappropriation of property** the company that could potentially cause harm or diminish efficiency or, in any event, is opposed to the interests of the company;
- **Acquire the requisite authorizations** in the event of utilizing the asset beyond the company.

The increasing reliance on information technologies necessitates the assurance of availability, security, integrity, and optimal efficiency of this specific category of assets.

Each Collaborator is required to:

- **Refrain from sending email messages** Threatening or insulting language is unacceptable; refrain from using expressions that undermine the dignity of others. Avoid making inappropriate or unwelcome remarks concerning Edison's Standards of Conduct, as such comments may offend individuals and/or tarnish the company's reputation.
- **embrace a responsible approach in usage** from all media, particularly social networks, to prevent the dissemination of any information that could jeopardize personal safety, the safety of colleagues, or the interests of the company;

- **Refrain from sending spam or "chain letters."**

that may generate data, information, or process traffic on the company's telematics network to the extent of significantly diminishing network efficiency, thereby adversely affecting productivity;

- **Refrain from visiting internet websites** with inappropriate and objectionable content;
- **to meticulously embrace the** provisions of the company's security policies to ensure the functionality and protection of information systems are not compromised;
- **Refrain from overloading systems** business utilization of borrowed or unauthorized software, and abstain from creating unauthorized copies of licensed programs for personal, business, or third-party purposes.

The use, even if unintentional, of these assets for any purpose unrelated to the company's activities can inflict significant harm on the organization (economic, reputational, competitive, etc.), compounded by the potential for criminal and administrative penalties, as well as the necessity to implement disciplinary actions against the Collaborators.

Edison strictly prohibits any use of its computer systems that may contravene applicable laws, as well as any actions that infringe upon the freedom, integrity, and dignity of individuals, especially minors. Additionally, Edison forbids any use of its computer systems that could result in unauthorized access to or damage to the computer systems of third parties.

Gifts or additional advantages

It is strictly forbidden to offer, either directly or indirectly, on a personal basis, to administrators, managers, officers, employees of Edison, suppliers, contractors, providers of clients, competitors, public administration entities, public institutions or other private organizations or entities with the intent of securing undue advantages. Acts of business courtesies and gifts of hospitality are permissible within the bounds of customary practices, provided they are of modest value and do not compromise or influence the recipient's autonomy of judgment. In all instances, this category of expenditure must consistently receive authorization from the designated position outlined in the procedures and be appropriately documented. Employees are similarly prohibited from accepting gifts or preferential treatment, except within the parameters of customary courtesy and provided such gifts are of modest value. Should an employee receive a gift that surpasses these limits, they are required to promptly notify their supervisor, who, in collaboration with the compliance officer, will facilitate the return of the gift or its allocation for a more appropriate purpose, while also informing the giver of Edison's policy regarding this issue. This regulation encompasses gifts that are promised or offered, in addition to those that are received.

This also applies in countries where presenting valuable gifts to business partners is customary.

C – Ethics of the communication and external affairs

Relations with governmental entities

Edison fosters ongoing relationships

with local, regional, national, and international institutions to articulate its stance on pertinent issues, evaluate the implications of legislative and administrative actions on its operations, and address specific inquiries (e.g., parliamentary hearings).

Interactions with officials of public institutions are restricted to pertinent functions or individuals who have received a specific mandate from Edison's senior management.

Such interactions must occur in a spirit of

loyalty, transparency, and constructive

collaboration with public institutions, aimed at

promoting and safeguarding Edison's interests.

Edison advocates for its interests in a transparent, rigorous, and consistent manner, eschewing any collusive behavior.

Relations with representatives of political factions

Edison cultivates relationships with representatives of political factions primarily to enhance his understanding of pertinent issues and to advocate for his positions transparently.

Edison neither finances nor supports political parties or their representatives, maintaining strict neutrality regarding the parties involved during election campaigns or events in which political parties participate.

Relations with relevant associations

Edison fosters relationships with relevant associations (e.g., the Association of Business Organizations) to enhance its activities, establish mutually advantageous forms of collaboration, and articulate its positions on matters of shared interest.

The disclosure of particular Edison roles in partnerships requires the approval of senior management or pertinent departments.

Media relations

All interactions with the media must be managed solely by authorized personnel. Media relations are founded on a respect for the right to information.

Relations with the media are founded on a respect for the right to information.

Information disseminated to the media must be accurate, coordinated, and aligned with Edison's principles and policies; it must adhere to laws, regulations, and standards of professional conduct; and it must be communicated with clarity and transparency.

The dissemination of false information is strictly prohibited.

"Price-sensitive" information is disclosed solely in accordance with the guidelines outlined in the "Treatment of Inside Information."

Institutional communication

The information regarding Edison (company profiles, audiovisual presentations, etc.) is founded on the highest standards of transparency and accuracy of the data presented. In the case of attending conventions, congresses, and seminars, as well as writing articles, essays, and publications in general, and participating in public interventions, any information pertaining to the activities, results, positions, and strategies of Edison may only be disclosed, unless already in the public domain, in accordance with the procedures established for the "Treatment of Privileged Information."

Sponsorships and grants

Edison may offer grants and sponsorships to support initiatives put forth by public or private entities, as well as by legally established non-profit organizations that advocate for Edison's Ethical Principles.

Sponsorships and grants may pertain to events and initiatives of a social, cultural, sporting, or artistic nature. They may also serve as venues for studies, research, conventions, and seminars on topics pertinent to Edison. Whenever feasible, Edison engages in the planning of these events to guarantee their quality. In choosing the initiatives to endorse, Edison exercises utmost caution to prevent any potential conflict of interest, both personally and professionally.

National and European public funding

Edison solicits and obtains grants and public assistance from national or European entities and/or institutions for the implementation of projects, investments, and/or research aligned with its business activities.

In executing these activities, Edison commits to adhering to the provisions set forth by applicable Italian and/or European regulations, as well as complying with the internal rules established for managing relations with public representatives and ensuring the appropriate use of these funds. The company conducts its operations in this domain with utmost diligence, rejecting any illicit or improper use of the received subsidies, along with any irregular practices that contravene the agreements established with the Issuing Entity.



Implementation
Standards

3



If an employee becomes aware of circumstances that may actually or potentially constitute a violation of the Code of Ethics, they must promptly report it to the Head of Compliance or the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries.

Complaints will be addressed and processed in accordance with the procedures and principles outlined in the Internal Information System

Policy of Edison Next Spain S.L.U., to which we fully refer.

Edison Next Spain S.L.U. offers an online platform for submitting complaints, accessible on the Company's website.

<https://edisonnext.es/>

The platform is also accessible through the following link:

<https://whistleblowersoftware.com/secure/edisonnextspain>

Compliance Officer

The collegiate entity, the Ethics and Compliance Committee of Edison Next Spain S.L.U. and its subsidiaries, serves as the Ethics and Compliance Officer for the Company and its subsidiaries.

The Compliance Officer is the individual appointed within Edison S.p.A. and its subsidiary companies, to whom the Board of Directors entrusts the responsibility for overseeing all matters pertaining to the dissemination and implementation of the Code of Ethics.

In the absence of a specific designation, the responsibilities of the Compliance Officer will be undertaken by the Chairman/Executive Director of the company.

The responsibilities of the Compliance Officer include:

- **guarantee the proper execution of** The provisions outlined in the company's procedure for reporting violations are designed to ensure adequate confidentiality protection. This procedure aims to regulate the process to facilitate fairness and to prevent irrelevant, unfounded, or entirely baseless complaints.
- **Ensure the effectiveness of processes in** communication, training, and participation; coordinating initiatives for the dissemination and comprehension of the Code of Ethics.
- **serve as a reference point for the** interpretation of pertinent aspects;
- **Oversee the revision of the Code of Ethics;** • **Employ audit frameworks** internal to conduct the requisite periodic assessments concerning the implementation of the Code of Ethics;
- **coordinate the activities of the** Compliance Officers from the other subsidiary companies of Edison S.p.A. offer assistance as needed.
- **coordinate interventions in the** Edison's subsidiaries to ensure adherence to the Code of Ethics.

Training and Communication

The Compliance Officer, in collaboration with the Head of Compliance, is responsible for developing and implementing suitable internal communication and training programs to promote awareness and understanding of the Code of Ethics.

Other comparable communication initiatives have been implemented to disseminate the contents of the Code of Ethics and to inform stakeholders about the procedures for reporting potential violations.

Business administration

All managers (Heads of Division, Business Unit, Directorate, or Department) bear a primary responsibility concerning the Code of Ethics.


To accomplish this, they must:

- to ensure adherence to the Code of Ethics that exemplifies the expected conduct for its Collaborators;
- guide the Collaborators of to ensure that they regard adherence to the Code of Ethics as a fundamental aspect of job performance quality; Encourage your employees to collaboratively examine elements pertaining to the application and interpretation of the Code of Ethics.
- oversee the search and selection process for external advisors in alignment with the principles and values outlined in the Code of Ethics;
- notify promptly in accordance with the modalities outlined in the Internal Information System Policy of Edison Next Spain S.L.U. referenced above in instances of potential violations;
- implement preventive measures suitable and just;
- avert any form of reprisal.

Value of the Code

from AN D

Adherence to the principles and regulations of the Code of Ethics, along with its consistent promotion and practical implementation within the framework of assigned duties, forms a fundamental and integral aspect of the contractual obligations of each Collaborator.



The ten principles
of the Global
Compact

4



Edison became a participant in the Global Compact in 2005. The Global Compact unites numerous companies across the globe that pledge to uphold ten principles concerning human rights, labor standards, environmental protection, and, since 2004, the eradication of corruption. By joining the Global Compact, Edison reaffirms its dedication to advancing the implementation of these principles, demonstrating annually the progress achieved.

Human Rights

1. Companies are obligated to advocate for and uphold universally recognized human rights within their respective spheres of influence, ensuring that they are not, even indirectly, complicit in
2. human rights violations.

Job

3. Companies must uphold workers' freedom of association and acknowledge the right to collective bargaining.
4. the eradication of all forms of forced and compulsory labor;
5. the successful eradication of child labor;
6. the eradication of all forms of discrimination in employment and profession; and

Environment

7. Companies are obligated to

Adopt a proactive strategy to address environmental challenges; implement initiatives

8. that foster increased accountability and support the advancement and distribution of
9. sustainable technologies.

Combat corruption

10. Companies pledge to combat corruption in all its manifestations, including extortion and bribery.



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1

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