

**Subject:** Digital Accessibility Policy**Application Areas**Perimeter: *Global*

Staff Function: -

Service Function: *Digital Solutions*Business Line: -

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THE HEAD OF GLOBAL DIGITAL SOLUTIONS  
**Carlo BOZZOLI**

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## 1. DOCUMENT AIMS AND APPLICATION AREA

This Policy expresses Enel's commitments and responsibilities in the implementation of Digital Accessibility, in line with technical, regulatory, international, consolidated and developing standards. These commitments and responsibilities, applicable to the conduct of business and corporate activities, are undertaken by the Enel Group, i.e. by the collaborators of Enel S.p.A. and the Companies controlled by it<sup>1</sup>, be they directors or employees of these companies in any sense of the word. Enel promotes the adoption of and compliance with international Digital Accessibility standards in its business relations<sup>2</sup> and the adherence to the same standards by contractors, suppliers and business partners, paying particular attention to contexts with a high impact on the lives of people and communities.

Enel is committed to ensuring equality<sup>3</sup> and universal access to digital systems and to implementing *Universal Design*, by making and buying products and services that are easy to use, accessible and that improve everyone's quality of life.

This Policy shall be implemented and applied to the extent possible within the Enel Group and in compliance with any applicable laws, regulations and governance rules, including any stock exchange and unbundling-relevant provisions, which in any case prevail over the provisions contained in this document.

## 2. DOCUMENT VERSION MANAGEMENT

Version	Date	Main changes description
1	04/06/2021	Issuing of 1142 policy.

## 3. UNITS IN CHARGE OF THE DOCUMENT

Responsible for preparing the document:

- GDS: Content Accessibility Design and Compliance Master Chapter
- LCA: Sustainability Legal Assistance
- LCA: Global Digital Solutions

Responsible for authorising the document:

- P&O: Head of People and Organization GDS

<sup>1</sup> "Enel" means Enel SpA together with all the companies directly and/or indirectly controlled by it.

<sup>2</sup> The term "business relationships" includes "relationships with business partners, enterprises in the value chain as well as any other state or non-state entity directly related to the activities, products or services of the enterprise" (see Principle 13, "Guiding Principles on Business and Human Rights: implementing the United Nations "Protect, Respect and Remedy" Framework").

<sup>3</sup> Equality is defined in the UN Convention on the Rights of Persons with Disabilities and its protocol ratified by the EU Parliament on 3 March 2009. Please see the official website <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>

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## 4. REFERENCES

- The Code of Ethics of Enel Group
- The Enel Group Zero Corruption Tolerance Plan (ZTC)
- Human Rights Policy
- Organization and Management Model as per Legislative Decree No. 231/2001
- Enel Global Compliance Program (EGCP)
- Organizational procedure No. 551 "Process-related organizational documents governance"
- Organizational Communication No. 109 "IT Platforms Master Chapter"
- Organizational Communication No. 226 "Digital Accessibility Design Community"
- Policy No. 25 "Management of Logical Access to IT Systems"
- Policy No. 27 "Diversity and Inclusion"
- Policy No. 37 "Enel Mobile Applications"
- Organizational Procedure No. 36 "Solutions Development & Release Management"
- Organizational Procedure No. 271 "GDS Purchases Request Management and Delegated Purchases"
- Organizational Procedure No. 593 "Preparation of Group Sustainability Report and Consolidated Non Financial Declaration"
- Guidelines "Digital Accessibility by Design"

As international regulatory framework, this Policy supports the following main reference standards and guidelines and applies their underlying principles:

- Web Content Accessibility Guidelines (WCAG)
- European Standard EN 17161:2019
- European Standard EN 301549
- ISO/IEC 25000
- Convention on the Rights of Persons with Disabilities (CRPD)
- European Disability Strategy 2010-2020;
- Council Decision 2010/48/EC, of 26 November 2009, concerning the conclusion, by the European Community, of the United Nations Convention on the Rights of Persons with Disabilities;
- EU Directive 2016/2102 relating to the accessibility of public bodies' websites and mobile applications;
- Directive (EU) 2019/882 on accessibility requirements for products and services (so-called "European Accessibility Act").

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## 5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY

Process Area: Digital Solutions

Macro Process: Solution Design, Development and Release Management

Process: Digital Service Design

## 6. DEFINITIONS AND ACRONYMS

Acronym and Keywords	Description
<b>Assistive Technologies</b>	The tools and technical solutions, hardware and software, that enable a person with a disability, by overcoming or reducing their disadvantage, to access information and services provided by computer systems and/or other human-machine interfaces.
<b>Digital Accessibility</b>	The ability of information systems, including websites and mobile applications, in the forms and to the extent permitted by technological knowledge, to deliver services and information that can also be used, without discrimination, by those who need assistive technologies or special configurations due to their disabilities.
<b>Universal Design</b>	The design of digital products and environments that are enjoyable and usable by everyone as far as possible, regardless of age, ability and/or social status.
<b>Usability</b>	This defines the degree of ease, effectiveness and satisfaction with which the interaction between man and machine, or any other digital system/service, is carried out.

## 7. GENERAL PRINCIPLES

The advent of digitalisation has been a revolution in the modern age, bringing about a series of changes in social and especially relational life.

Its appearance redefined the concepts of space and time and, by extension, the very essence of the individual citizen: digital environments, in addition to reducing physical and communication distances, generate relationships that are no longer just based on face-to-face dealings. In this context, usability and digital accessibility become essential prerogatives for the effective participation of people in an increasingly digitalised society.

Digital accessibility, therefore, can be considered the ground zero of the democratic guarantee, the tool through which to ensure the usability of information technology for all.

Digital Accessibility and Usability include features such as:

- simplicity of access and use,
- ease of learning,
- adaptability,
- effectiveness in achieving results.

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In line with its sustainability strategy, according to an inclusive vision of diversity, Enel is committed to considering Digital Accessibility and Usability as fundamental elements and integral parts of its Code of Ethics.

Digital Accessibility is the enabling factor that allows everyone to fully exercise their fundamental rights and freedoms. To this end, several countries have enacted laws and regulations to encourage its development and to protect the objectives it serves. In line with the regulations in force, Enel undertakes to make the various digital products and services accessible and/or usable, in order to guarantee their effective use and to make the attendant “user experience” as positive and rewarding as possible for everyone.

Enel recognises the value of Digital Accessibility and Usability as *best business practice* and promotes its implementation in accordance with international and national reference standards and regulations<sup>4</sup>. Enel Group companies, even if established outside the European Union, shall implement this Policy to the extent that it does not conflict with applicable local legislation.

These provisions are complemented by national regulations that many countries have adopted and are in the process of adopting in order to ensure Digital Accessibility. These provisions will be further developed and addressed in the specific Country/Region Annexes for Digital Accessibility, prepared in accordance with the applicable national legislation and taking into account this Policy, of which they are an integral part.

Enel also undertakes to sign contracts with suppliers that promote and take into account the implementation of Digital Accessibility and Usability.

### 7.1 Respect for diversity and non-discrimination

Enel undertakes to remove or, where this is not possible due to technological limitations, to reduce the digital barriers that may determine a condition of temporary or permanent disadvantage or discrimination for all persons, whether they are employees, collaborators (also) external to Enel, or external *stakeholders* with whom Enel interacts, promoting the implementation of Digital Accessibility and Usability and, therefore, the recognition of equal opportunities in the use of digital services and products.

In particular, Enel is committed to pursuing Digital Accessibility and Usability in the design and development of digital tools (e.g., websites, applications) when such activities are carried out internally or when they are entrusted to third parties.

When procuring digital goods and services, preference will be given to products and services that apply the applicable national and international standards of Digital Accessibility and Usability and that meet their respective requirements.

### 7.2 Working conditions and training

Enel is committed to ensuring that its employees with disabilities have access to appropriate Assistive Technologies, whether in hardware and software form, as well as the opportunity to receive individual training necessary for their use.

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<sup>4</sup> For the relevant national regulations, please refer to the specific Country Annexes which form an integral part of this Policy.

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## 8. PROCESS DESCRIPTION

### 8.1 Implementation

In order to implement the commitments expressed in this Policy, by means of Organizational Communication No. 226, Enel has set up the *Digital Accessibility Design Community*, appointing the *Content Accessibility Design and Compliance Master Chapter* as the body responsible for identifying strategies and objectives relating to Digital Accessibility, monitoring the progress of Digital Accessibility projects and promoting synergies and collaborations in this area.

### 8.2 Monitoring

The *Content Accessibility Design and Compliance Master Chapter* reports the results of its activities to the Innovability Global Digital Solutions Unit in order to highlight them in the Enel Group Sustainability Report (ref. OP No. 593 "Preparation of Group Sustainability Report and Consolidated Declaration on non-financial information").

### 8.3 Reporting made by Stakeholders

Enel's digital products and services must make available to all stakeholders the tools useful for collecting any reports where *stakeholders* encounter difficulties or for reporting possible violations of the commitments set out in this Policy.

The tools available to employees are:

- IT Help Desk at Enel Call Centre (contact by telephone)
- OneClick Portal in self service mode

Information on the tools described above is available to all employees via the company intranet.

The companies of the Enel Group have to make available to customers and external stakeholders the Accessibility statement within their digital products and services, which shall contain useful information for reporting any Digital Accessibility issues.