

DEIB POLICY OF THE ENEA GROUP, DIVERSITY AND GENDER BALANCE POLICY OF ENEA S.A.'S GOVERNING BODIES

Introduction

The ENEA Group recognizes diversity, equity, inclusion and belonging (DEIB) as the cornerstones of a modern and responsible organization.

The DEIB policy applies to all member companies of the ENEA Group and applies to all employees, collaborators, contractors and business partners.

The DEIB policy is aligned with the "ENEA Group Development Strategy until 2035" and is pursued in accordance with the principles of sustainability and the ESG strategy.

I. Objectives of the DEIB Policy

The primary objective is to create a work environment where every individual is treated with respect, enjoys equal opportunities for growth and feels part of the organization.

We create workplaces where diversity, equity, inclusion and belonging are all components of our daily practice.

We build an organizational culture that fosters innovation, engagement and employee satisfaction.

We enhance the ENEA Group's competitive position in the market through improved business performance, higher talent retention and a favorable employer brand.

We respond dependably to the expectations of our stakeholders: employees, customers, business partners, local communities and shareholders.

II. Four concepts underpinning the pursuit of the policy

1. **Diversity:** We value and leverage the wealth of experiences, competencies, age, gender, sexual orientation, religion, background and other aspects of human identity.
2. **Equity:** We ensure equal access to resources, promotions, training and compensation by eliminating systemic barriers.
3. **Inclusion:** We involve everyone in decision-making processes, listen to opinions and create space for dialogue.
4. **Belonging:** We build a culture of psychological safety where everyone feels part of the team, finds meaning in their work and is permitted to express themselves without fear of judgment or retaliation.

III. DEIB – key to responsible organizational development

1. **Employee needs** – building a culture of respectful relationships, development programs, anti-discrimination policies, access to benefits and flexible work arrangements.
2. **Business perspective** – attracting and retaining talent in a competitive job market while improving team innovation and creativity.
3. **Business benefits** – increased loyalty, engagement, job satisfaction and financial performance.
4. **Customer expectations** – growing social awareness requires companies to take inclusive actions that are accessible to everyone and reflect the diversity of consumers – male and female alike as well as people with disabilities.
5. **Decision-making and management** – diverse teams and management boards make more informed decisions and accomplish better outcomes.
6. **Legal regulations and EU directives** – regarding gender balance on management boards, equal pay, due diligence and ESG reporting.

IV. Professional development and human resources management strategy

1. **Leadership and accountability** – role of leaders: commitment of the management board, top executives and leaders to building an inclusive culture.
2. **Support structures** – Diversity Team (management board, HR, officers, employees) and DEI ambassadors/leaders responsible for implementing and monitoring initiatives and regulations.
3. **Equitable HR processes** – inclusive recruitment, initiatives to reduce inequalities in the representation of women and men in leadership positions, addressing pay gaps, mentoring, anti-discrimination training, intergenerational management, support for employees returning from parental leave and those with disabilities, establishment of employee networks (women, seniors, others).
4. **Supporting the professional development of women and men** – ensuring equal access to development, mentoring and training programs as well as initiatives that foster managerial, leadership and supervisory competencies, and thereby providing equal opportunities for career advancement. Such measures also serve to build a diverse pool of individuals with the qualifications and experience necessary to apply for future management jobs and roles on ENEA S.A.'s governing bodies.
5. **Human resources management strategy** – incorporates transparent and non-discriminatory recruitment and promotion practices that encourage diversity and gender balance, equal access to training and development programs and the fostering of an organizational culture based on equity, inclusivity and

diversity. Data on employment, promotions and the representation of women and men in management positions are monitored. The need to ensure gender balance is also taken into account in succession planning and executive development.

6. **Safe and supportive work environment** – mechanisms for reporting irregularities, measures to prevent mobbing and harassment, employee wellbeing, flexible work arrangements and parental leave policies.
7. **Education, awareness and communication** – training for leaders, managers and all employees (unconscious bias, inclusive language, non-exclusionary communication), internal and external campaigns, inclusive communication – accessible, free of stereotypes and reflective of the diversity of employees, customers and society.
8. **Data analysis and reporting** – satisfaction surveys, monitoring the pay gap, diversity metrics within teams, ESG reports and market benchmarks.

V. Accountability

1. **ENEA S.A. Management Board**
   - Provides the financial, human and technological resources necessary to implement the policy.
   - Personally communicates the commitment to implementing DEIB.
2. **Diversity Team**
   - Consists of representatives of the Management Board, HR, officers and employee representatives.
   - Monitors policy pursuit and recommends development initiatives.
3. **Managers and HR**
   - Work to prevent discrimination and mobbing.
   - Organize training, mentoring and support programs.
   - Integrate DEIB principles into HR processes (recruitment, evaluations, development, benefits and compensation).
4. **All employees**
   - Respect the principles of equitable treatment and inclusive communication.
   - Report irregularities in a safe manner.
   - Support the development of a culture based on respect and cooperation.

VI. Diversity and gender balance policy in ENEA S.A.'s governing bodies

1. **Scope, definitions and regulatory purpose**
   - Notwithstanding the general DEIB principles in effect within the ENEA Group, ENEA S.A. implements specific principles regarding diversity and gender balance in the Company's governing bodies.
   - The provisions of this section apply to the ENEA S.A. Management Board and Supervisory Board, hereinafter collectively referred to as "ENEA S.A.'s governing bodies", and are intended to fulfill the obligations arising from the provisions of Chapter 4aa of the Act of 29 July 2005 on Public Offerings and the Terms and Conditions for Introducing Financial Instruments to an Organized Trading System and on Public Companies, hereinafter referred to as the "Act".
   - "Underrepresented gender" means the gender whose representatives hold no more than 49% of the total number of positions on ENEA S.A.'s governing bodies
   - ENEA S.A. takes steps to achieve the regulatory objective provided for in the Act. The regulatory objective is deemed to have been achieved if the total number of positions on ENEA S.A.'s governing bodies held by persons of the underrepresented gender is no less than the number closest to 33% of all positions on those bodies, while such persons hold positions on each of ENEA S.A.'s governing bodies
   - ENEA S.A. strives to ensure diversity in the composition of its Management Board and Supervisory Board also in terms of education, specialized knowledge, age, professional experience and competencies, while adhering to the overriding principle of selecting individuals with the qualifications necessary to properly perform their duties.
2. **Principles of the selection process and nomination of candidates for ENEA S.A.'s governing bodies**
   - Before the selection process begins, neutral, clear and unambiguous criteria are established, taking into consideration the qualifications of the candidates and the need to ensure gender balance. Such criteria are applied in a non-discriminatory manner at every stage of the process.
   - The selection of an individual for a position on a governing body in ENEA S.A. is based on a comparative assessment of the qualifications of each candidate participating in the selection process. The comparative assessment is carried out based on criteria established before the commencement of the process and covers, in particular, knowledge, competencies, skills, professional experience and other requirements specific to the position in question.
   - The comparative assessment and its outcome must be documented to the extent necessary to demonstrate the proper conduct of the selection process and to substantiate the final selection.
   - The nomination of candidates for positions on ENEA S.A.'s governing bodies is effected in a manner aimed at achieving the regulatory objective, in compliance with applicable laws and internal regulations.
   - Entities authorized to nominate candidates are required to ensure, to the extent permitted by the nature of the process and the availability of individuals who satisfy the formal and substantive requirements, that representatives of both genders are included among the nominees.
3. **Preference and exceptions to the preference principle**
   - If candidates have equivalent qualifications, preference is given to the candidate of the underrepresented gender. A deviation from this principle is permissible only in exceptional cases where other material diversity principles – arising from regulations, based on objective and non-discriminatory criteria and taking into consideration the specific situation of the candidate – warrant such a deviation.

- Any deviation from the preference principle requires documentation of the outcomes of the comparison of qualifications and a rationale for the selection made.

4. **Candidate's right to information and legal protection**
   - At the candidate's request, ENEA S.A. is required to provide the candidate, in written or electronic form, with information regarding the selection criteria applied in the process, the outcomes of the comparative evaluation along with a rationale, and, in the event of a waiver of preference for an underrepresented gender, also the reasons for the waiver and the qualifications of the selected candidate, in compliance with personal data protection regulations.
   - The candidate is entitled to the legal remedies specified in applicable regulations, including the right to compensation or damages in the event of a breach of the statutory requirements for the selection process. The rules regarding the burden of proof are laid down in the applicable laws.

VII. Monitoring and reporting

1. Progress in the pursuit of the DEIB policy will be monitored on an annual basis by the Diversity Team and reported to the ENEA S.A. Management Board and to stakeholders as part of the non-financial ESG report.
2. The ENEA S.A. Management Board ensures the monitoring of the fulfillment of the regulatory objective referred to in §6 and prepares an annual report on the representation of each gender in ENEA S.A.'s governing bodies as well as the measures taken to ensure gender balance (hereinafter referred to as the "Report"), containing the following:
   - number of individuals holding positions on ENEA S.A.'s governing bodies, broken down by gender and type of position held,
   - information on the measures taken to ensure the participation in the Company's governing bodies of individuals of the underrepresented gender in a number consistent with the regulatory target,
   - if the regulatory target has not been met – indication of the reasons for failing to achieve it and description of the actions taken and planned to attain it.
3. The Report may form a separate section of the management report referred to in Article 49(1) of the Accounting Act of 29 September 1994.
4. ENEA S.A. publishes the Report on its website and submits it to the competent government agency responsible for implementing the principle of equal treatment within the time limit specified in the Act.