**Responsible Renewable Energy: 10 Questions on Human Rights**

**Name of company**: \_\_\_\_\_\_\_\_\_\_\_\_\_

**Projects registered under UN Clean Development Mechanism (if any):** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Human rights policy commitment**[*Examples & guidance*](http://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/implementation-by-companies/type-of-step-taken/human-rights-policy-statements)

1. Does your company have a publicly available commitment to respect human rights? If so, please provide a link.

*Yes it does. https://www.enel.com/en-gb/documents/sustainability/enel\_policy\_sui\_diritti\_umani\_human\_rights\_policy.pdf*

**Human rights due diligence**[*Examples & guidance*](http://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/implementation-by-companies/type-of-step-taken/due-diligence-general)

1. Does your company identify its salient human rights issues and does it have a due diligence process to manage them? If so, please list the issues and describe the due diligence process (key steps include: impact assessment, integrating & acting on findings, tracking responses & communicating how impacts are addressed).

*Not yet*

**Community engagement & consultation**[*Examples & guidance*](http://business-humanrights.org/en/guidance-community-engagement-0)

1. What criteria does your company use to identify communities that may be affected by renewable energy projects it is involved in?

*We typically follow national legislations defining the area affected by our projects. When not available, under the framework of our Creating Shared Value Model, we apply a tool, Socio-Economic Environmental Context Analysis , that helps us, among other things, identify the impacted area.*

1. How does your company consult with affected communities (on impact assessments, resettlement, benefit sharing plans, etc.)? Please describe what form consultations take and when they are carried out in a project’s cycle.

*We follow national legislations (ie. Application of OIT 169) , and when not available we do implement consultations with the communities ( see :* [*https://www.enel.com/en-gb/Documents/FinancialReports/report2014/enel\_sustainability\_report\_2014.pdf*](https://www.enel.com/en-gb/Documents/FinancialReports/report2014/enel_sustainability_report_2014.pdf)*;, pg. 69; 73)*

*Moreover in the materiality matrix we perform each year, communities are one of the key stakeholders included.*

1. Does your company ensure its consultations include the perspectives and respect the rights of all affected community members (including those who may be marginalised for reasons of race, ethnic origin, gender, social status, age, religion, wealth or income or other considerations)? How is this ensured?

*The Social Environmental Economic Context Analysis helps us taking them into account.*

**Free, prior and informed consent**[*Examples & guidance*](http://business-humanrights.org/en/business-action-0/issue-guidance/indigenous-peoples)

1. Under what circumstances does your company commit to seeking an affected community’s free, prior & informed consent to a project? Please provide examples of projects where free, prior & informed consent was sought (if applicable).

*We follow the National legislation (ie. Application of OIT 169) , and when not available we do implement consultations with the communities ( see :* [*https://www.enel.com/en-gb/Documents/FinancialReports/report2014/enel\_sustainability\_report\_2014.pdf*](https://www.enel.com/en-gb/Documents/FinancialReports/report2014/enel_sustainability_report_2014.pdf)*;, pg. 69; 73)*

1. What is your company’s process for obtaining and evaluating free, prior & informed consent?

*We do not have a structured process*

1. Has your company faced any challenges in its process to seek free, prior & informed consent for renewable energy projects? If so, please describe what steps your company has taken to overcome these challenges.

*We have not taken structured steps to overcome these challenges.*

**Security**[*Examples & guidance*](http://business-humanrights.org/en/security-issues-conflict-zones-0)

1. What steps does your company take to ensure that its own personnel, private security companies it contracts with, and/or government forces providing security to its projects, respect the rights of workers and community members, including those who may oppose its projects?

*We do not have a structured process for it.*

**Remedy**[*Examples & guidance*](http://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/access-to-remedies-grievance-mechanisms/non-judicial-grievance-mechanisms/company-based)

1. Does your company have a grievance mechanism in place at each project site for affected communities and workers to raise concerns about local impacts, including human rights abuses? If so, were affected communities involved in the design of the grievance mechanism, including its set-up and the types of remedies it provides?

*Enel Group has channels where it is possible to report presumed violations to the Code of Ethics.*

*The Code of Ethics, which Enel adopted in 2002, applies throughout the Group in light of the cultural, social and economic diversity of the various countries where Enel operates.The principles of the Code of Ethics range from market correctness to protecting the environment and workers. These general principles are then set out in the form of conduct criteria to be adopted in dealings with the various interlocutors. The Code of Ethics applies to the companies in which Enel has a majority interest,in addition, the Group’s main suppliers are required to act inkeeping with the general principles expressed in the Code. The Audit Department, with the support of the company departments involved, is responsible for verifying the application of and compliance with the Code of Ethics. Through dedicated channels in the various countries, it receives and analyses notifications of alleged violations of the Code. In handling the notifications, and without prejudice to any legal obligations, the identity of those making such reports is always kept confidentialand they are protected from any kind of retaliation. In 2014, 151 notifications were received and 27 violationsrecorded, including 8 involving episodes of corruption, as defined by the Global Reporting Initiative, and following which specific corrective measures were established.*

**Other information**Please provide any further information regarding your company’s policies and practices on human rights that you think is relevant.

*Enel Green Power is a participant in the Global Compact, an action program sponsored by the United Nations to create a global economy that is respectful of human rights, the fight against corruption, labour and safeguarding the environment.*

*In relations with vendors, Enel Green Power follows the general contract conditions of the Enel Group, which govern contractual relations between the companies of the Enel Group and our contractors as concerns the purchase of materials, equipment, and services and also require observance of the principles defined in the Code of Ethics, the Zero Tolerance Plan, the Compliance Model, and the principles of the Global Compact on human rights.*

*Service and provision contracts are granted in accordance with prevailing legislation and with the principles of cost-effectiveness, fairness, competitiveness, and disclosure and following procurement procedures that ensure the utmost transparency, objectivity, and equality of treatment to all participating firms. Specific standards of sustainability are also called for within the scope of qualification procedures, the selection of providers, the contract clauses, and the procedures for verifying the work of vendors.*

*The general contract conditions governing the vendor relationship also call for the adoption of preventive measures and other measures needed in order to ensure that the contractor protects the environment, while also requiring that the following ethics-related clauses be agreed to:*

*the Global Compact clause, by which vendors undertake to observe the principles of the Global Compact as concerns human rights, labor, environmental protection, and combatting corruption, as well as to ensure that all activities conducted by their own employees or by sub-contractors are in line with these principles;*

*the anti-corruption clause, which requires vendors to be aware of Enel’s commitments in combatting corruption and to assume the obligation not to make any unlawful promises or make or accept illegal payments as part of execution of the contract on behalf the Group or to the benefit of its employees, any violations of which grant the Group the right to terminate the contract and demand damages;*

*the clauses concerning the respect of human rights, which are included in all contractor agreements and service contracts and prohibit the use of child or other forced labor, allow the right to unionize, prohibit discrimination, and require vendors to observe the obligations of safety and environmental protection;*

*for contracts signed in Italy, the clause referencing the Lawfulness Protocol, which requires that vendors respect the provisions of the framework protocol between Enel and Italy’s Interior Ministry against the infiltration of organized crime and to ensure observance of the law;*

*the clauses concerning worker health and safety, which also establish sanctions for violation of laws and regulations regarding the safeguarding of health and safety in the workplace. For any contractor violations of the obligations of health and safety in the workplace, the Enel Group has the right to assess fines proportionate to the seriousness of the violation.*