TAX TRANSPARENCY

| 3-3 | 207-1 | 207-2 | 207-3 | 207-4 |

DOUBLE MATERIALITY	SUSTAINABILITY PLAN PILLAR	SUSTAINABLE DEVELOPMENT GOALS (SDGs)
MATERIAL TOPICS: • Business conduct and ethics	SOUND GOVERNANCE	16 PEACE, JUSTICE AND STRONG INSTITUTIONS

Below the 2023 results related to the previous 2023-2025 Sustainability Plan, the resulting progress and targets of the 2024-2026 Sustainability Plan, which may be redefined, added, or outdated with respect to the previous Plan.

ACTIVITIES	2023 RESULTS	2024-2026 TARGETS	MAIN SDGs
TAX TRANSPARENCY			
Cooperative Compliance Index Group companies membership to cooperative compliance schemes (cooperative compliance with tax authorities)	**95%** (In line)	**96.7%** in 2026	16

Goals: New, Redefined, Outdated

Progress: Not in line, In line, Achieved

N.A. = not applicable, target not included in the 2023-2025 Sustainability Plan

Tax strategy

Since 2017, the Enel Group has had a tax strategy[1] consisting of a set of principles and guidelines inspired by the values of transparency and legality and published online at www.enel.com. The Group's subsidiaries are required to adopt the tax strategy approved by the Parent Company, thereby assuming the responsibility for ensuring that it is understood and applied.

Tax strategy objectives

The **Board of Directors** of Enel SpA (BoD) defines the tax strategy of the entire Group in order to ensure an fair, responsible and transparent tax contribution and guarantee a uniform management of taxation for all concerned entities, which is inspired by the following logic:

- correct and timely determination and settlement of taxes due under the law and implementation of the respective obligations;
- correct management of the tax risk, understood as the risk of violating the tax rules or abusing the principles and purposes of the tax system.

(1) Updated to September 21, 2022 by resolution of the Board of Directors of Enel SpA (BoD).

Tax strategy principles

The tax strategy principles are the guidelines for Group companies, underpinning their business operations when managing the fiscal variable. The principles also require suitable processes to be adopted to ensure their effectiveness and application.

Values: in line with its own sustainability strategy, the Group manages its tax assets in compliance with the values of honesty and integrity and is aware that the revenues deriving from levies represent one of the main sources of contribution toward economic and social development of the communities in the countries in which it operates.

Legality: the Group pursues behavior oriented toward observance of the applicable tax provisions and is committed to interpreting them in order to respect not only their form but also their substance.

Tone at the top: the Board of Directors has the role and responsibility of guiding dissemination of the corporate culture and values described above.

Transparency: the Group is transparent to all stakeholders and actively collaborates with the tax authorities, enabling the latter, *inter alia*, to gain a full understanding of the facts underlying the application of tax rules.

Stakeholder value: the Group implements a sustainable business model, aimed at creating and distributing value to all stakeholders over the long term. Tax contribution is one of the key components of the value distributed to communities and is managed in compliance with the principle of legality and through active cooperation with the tax authorities in accordance with the principle of transparency.

Governance

Enel SpA ensures that the tax strategy is acknowledged and applied within the Company through the governance bodies. Its interpretation is left to the Parent Company, through the Tax unit, which also manages its periodic updates. In particular, the tax strategy is reviewed annually and any changes that may be deemed necessary are submitted to the Board of Directors of Enel SpA (BoD), which decides on them.

Compliance

Group entities must respect the principle of legality, by swiftly applying the tax laws of the countries where the Group operates, to ensure that the wording, spirit and purpose of the applicable tax rule or system are respected. In addition, the Enel Group does not engage in behaviors and operations, domestic or cross-border, that result in purely artificial constructions that do not respect economic reality and which may be reasonably assumed to offer undue tax advantages. This is because they are contrary to the purpose or spirit of the relevant tax provisions or system and generate phenomena of double deduction, deduction/non-inclusion or double non-taxation, including as a result of asymmetries between the tax systems of the different jurisdictions.

Intercompany transactions

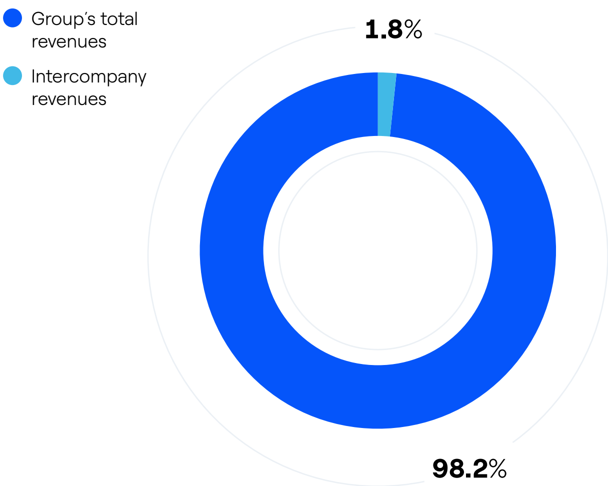
Intercompany relations are structured at market prices and conditions, ensuring value creation in the locations where the Group conducts its business. For all intercompany transactions relevant to transfer pricing regulations, the Enel Group has adopted a policy that is in line with the principle of free competition (arm's length principle), an international standard established by the Model Tax Convention and detailed in the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (hereinafter also referred to as the "OECD Guidelines"). To this end, the Group has put internal policies in place that comply with these guidelines and mainly provide for the application of the Comparable Uncontrolled Price – CUP method (which compares the price of goods transferred and/or services provided in a transaction concluded between associated companies with the price applied in transactions between independent third parties). The Group's transfer pricing policies refer to the following types of transactions: managerial services, technical and ICT services, staff secondments, intragroup loans, intercompany current accounts, guarantees and platforms.

Furthermore, consistent with the applicable regulations, Advance Pricing Agreements (APAs) are sought with local tax authorities on the determination of transfer prices and the application of rules relating to cross-border flows between Group entities. The APAs in force in 2023 are concentrated in Spain and relate to the management of common services in line with the Group's transfer pricing policies. During 2023, discussions began with the Dutch Tax Authorities with the aim of reaching an APA agreement aimed at confirming the transfer pricing methods applicable to the Group's financial transactions. The same transfer pricing policies have been positively discussed with the Italian Revenue Agency as part of the cooperative compliance regime.

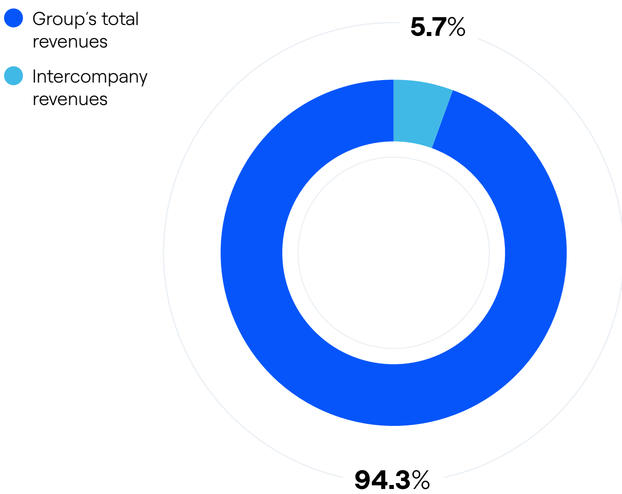
In particular, with specific regard to intercompany financial transactions, the Enel Group has organizationally adopted a centralized finance model for its subsidiaries, which requires that the Group's two financial companies, Enel Finance International (EFI) and Enel Finance America (EFA), centralize part of the treasury and financial market access activities and act as the primary point of reference for the management of financial or liquidity needs generated by the operating entities.

Before concluding any contract between its companies subject to transfer pricing regulations, the Enel Group manages this process using specific management and monitoring software which allows verification of the correct application of the selected methods, the margins obtained and more generally of transfer pricing policies, where applicable. Finally, when analyzing the size of intercompany transactions, it can be seen that these account for a minimal percentage (generally around 6%) of the Group's total aggregate revenues[2], due to the fact that the energy business is conducted almost entirely within the boundaries of the individual Country, from the power generation process to market sales. In 2023, intercompany transactions as a percentage of the Group's total aggregate revenue amounted to approximately 1.8%[3].

INCIDENCE OF INTERCOMPANY REVENUES 2023



INCIDENCE OF INTERCOMPANY REVENUES 2020-2022



(2) The calculation was carried out by comparing the revenues of cross-border intercompany transactions on the basis of the total revenues reported in the OECD CbCRs (Country-By-Country Reports) of the respective tax periods (*i.e.*, 108,165 million euros in 2020; 156,619 million euros in 2021; 267,913 million euros in 2022 and 168,447 million euros in 2023).

(3) The average value shown for 2023 is lower than the average value for previous years due to the results for the 2021 tax year, which, with the same number of intercompany transactions, saw an exponential increase in commodities and associated hedging transactions, with impacts on revenues, which led to an increase in this percentage to 10% in the reporting year, accordingly increasing the average value.

Low-tax jurisdictions

The Enel Group is present in the countries in which it operates exclusively for business reasons and this presence is not guided by tax-related purposes. The Group does not make investments in or through countries considered to have privileged taxation, hereinafter also "Low-tax jurisdictions"[(4)], for the sole purpose of reducing or transferring the tax burden. Such investments can only be considered if they are supported by valid economic reasons and are intended for development, in line with the business purpose of the Enel Group.

In cases where, in specific situations (*e.g.*, the purchase of companies from third parties), the presence of structures created for the sole purpose of reducing the tax burden or located in territories that qualify as Low-tax jurisdictions is found, the Group is committed to eliminating such structures as quickly as possible.

The definition of the criteria for identifying the so-called "Low-tax jurisdiction" is not unanimous at an international level and there are different lists which are prepared for example by institutions[(5)] and non-governmental organizations[(6)].

Recently, in its work relating to the Global Minimum Tax (GMT)[(7)], the OECD defined a Low-tax jurisdiction as a jurisdiction in which a multinational group is subject to an Effective Tax Rate ("**ETR**") of less than 15%.

Furthermore, through the so-called Transitional Safe Harbours, the GMT excludes countries which, despite having a tax rate of less than 15%, are places where companies are rooted, as proven by adequate amounts of material assets and/or personnel[(8)] or where business earnings are economically irrelevant and such as to exclude a priori a potential tax risk[(9)].

Considering that the aforementioned Global Minimum Tax regulation (the ETR Minimum Tax indicator and the tests related to the substance and economic relevance of the business) has become a reference for defining a "Low-tax jurisdiction", the Enel Group has decided to use this definition and, in keeping with its tax transparency strategy, represents that from the estimates made on the basis of the best interpretation of the documents published by the OECD, on the data as of December 31, 2023, almost all of the Group countries appear to have adequate levels of taxation and substantial level of presence of its business.

On a more general level, while adopting the ETR as defined by the rules on the minimum tax as a reference for identifying countries potentially having preferential taxation, Enel believes that the most representative indicator for evaluating the tax contribution in the territories where it has a presence is the Total Tax Contribution as defined in this section relating to tax transparency.

Tax incentives

Tax incentives are a key, development-oriented mechanism for economic policy, which countries use to stimulate growth and attract investment to support the national policy. The use of tax incentives generally determines a reduction in long-term tax payables (tax reduction) or else only the temporary deferral of the tax payment (tax deferral).

The Enel Group only uses widely applicable tax incentives for all operators and respects all specific regulations, where the incentives are in line with its industrial and operational objectives and are consistent with the economic substance of its investments. The main incentives that the Group benefits from relate to investments in renewable energy in countries that support the energy transition with these economic policy instruments, mainly the United States.

(4) For simplicity, this refers to tax havens, countries considered to have privileged taxation or low taxation, etc.

(5) EU list of non-cooperative jurisdictions for tax purposes as of October 2023: American Samoa, Anguilla, Antigua and Barbuda, Bahamas, Belize, Fiji, Guam, Palau, Panama, Russia, Samoa, Seychelles, Trinidad and Tobago, Turks and Caicos Islands, United States Virgin Islands, Vanuatu. Countries that cooperate with the EU but have pending commitments are: Albania, Armenia, Aruba, Botswana, British Virgin Islands, Costa Rica, Curaçao, Dominica, Eswatini, Hong Kong, Israel, Malaysia, Turkey and Vietnam.

(6) For example, Tax Justice Network, Oxfam and Observatorio de Responsabilidad Social Corporativa in Spain.

(7) Tax agreement signed in 2021 by around 140 countries.

(8) Routine profit test: this is passed when the sum of a percentage, applied to personnel costs and the value of tangible fixed assets, exceeds the EBT for the year. The purpose of this test is to exclude from GMT a multinational group that has a significant level of economic substance in a country on the basis of production assets held and personnel costs.

(9) *De minimis* test: this is passed if both of the following conditions are met in a country: a) revenue under 10 million euros and b) income (EBT) under 1 million euros. This test is intended to exclude those countries where the economic presence of a group is minimal or in the start-up phase.

Tax governance, control and risk management

Governance body

Enel's organization model provides for: (i) at least an annual flow of information to the Board of Directors from the Tax unit (so-called "Tone at the top")[10] with regard to the tax risk management and control system and the Tax Transparency Report, in which all relevant tax aspects of the Group are set out[11]; (ii) the Holding's Tax Affairs unit to be tasked, among other things, with implementing the Group's tax strategy defined by the Board of Directors, identifying, analyzing and managing the various optimization initiatives, monitoring the most significant tax issues, and providing support to the various Business Lines; (iii) the Tax Affairs units in the different countries to act, alongside the Holding Company Staff Function, in accordance with the values and principles set out in the tax strategy, being in charge of compliance management and tax planning and monitoring activities at the local level.

Organization

Enel has adopted a set of rules, procedures and standards which are part of the Group's wider organization and control system and which are considered key points of reference that all parties, depending on their type of relationship with the Group, are required to observe[12]. The various corporate policies and procedures applicable both at Group and country level govern the activities, as well as their management procedures and Tax Affairs responsibilities, including in relation to other corporate Functions. These documents are published on the Company intranet and are accessible to all Enel people. They form the general rules of conduct applicable within the Group when carrying out activities.

Specifically in relation to taxation, in addition to the tax strategy there are specific organizational documents in force – both at global and local level – regarding the processes of tax compliance, tax planning, transfer pricing, tax risk management and tax policy.

The general principle is that the Tax units must be of the appropriate size and equipped with the necessary skills to perform the role of a decision-making analysis center within the governance and business processes, in addition to the role of compliance oversight. For this purpose, specific and ongoing training initiatives on tax issues at both country and global level have been set up, with recurring meetings between all of the Group's Tax Managers in order to ensure appropriate alignment. Still within the context of the policies implemented for the management of Tax personnel, a specific hiring process has been established, to be followed when joining the Company and available on the Company website, which is based on objective assessments. As regards the management of managers, also within the tax department, succession plans are updated annually aimed at identifying resources ready to cover managerial positions in the short and medium term, supported by a specific development and empowerment path.

More generally, it is worth noting that the reference principles contained in the Group's tax strategy have also been included in the Enel Group's new Global Framework Agreement on fundamental rights and social dialogue (Global Framework Agreement), recently signed with the relevant Trade Union Federations, which confirms the centrality and universality of human, social and labor rights within the Company, in accordance with the Group's Human Rights Policy.

Enel is aware that an effective organizational and control system must be supported by valid **IT tools** that allow the collection, monitoring, management and verification of compliance of high-quality tax information in real time. The implementation of this data and system digitalization process is a continuous improvement process. The Group aims to be at the forefront of the application of the best and most modern digital development trends in tax. To this end, a special interdisciplinary (Tax and IT) team works to identify, develop and implement the best digital practices in the area of taxation, in order to oversee the different tax

(10) During 2023, the Board of Directors meeting was held on November 21, 2023.
(11) In particular, in order to implement the recommendations of the Corporate Governance Code, as well as to optimize its work, the Board of Directors of Enel SpA has established an internal Control and Risk Committee. The Committee receives a constant flow of information regarding, for example: the risk management and control system (including tax risk), the Tax Transparency Report, the Report on the tax risk management and control system in the context of the regimes for cooperative compliance with the tax authorities and the tax strategy.
(12) For example: the Code of Ethics; the Zero Tolerance of Corruption Plan; the Enel Global Compliance Program (EGCP); Human Rights Policy, corporate policies, models and procedures; the tax strategy; the Internal Control and Risk Management System; the proxy system; the sanctions system referred to in the applicable national collective Labor agreements; any other documentation relating to the current control systems; the relevant accounting standards; procedures and IT applications.

processes with an *ex ante* approach and thus minimize tax risks (*i.e.*, dashboards that provide the whole management with almost real time information on the trend, in the main countries of operation, of a series of tax variables such as: tax rate, tax litigation, tax compliance, intercompany transactions, correctness of invoicing processes, etc.).

Tax risks

The Group has a more general risk governance model based on "6 pillars"[13] and a uniform taxonomy of risks (so-called "risk catalogue"), which also includes tax compliance in its tax compliance risk section. This risk governance model also defines the Risk Appetite Framework (RAF), which is the framework for determining risk appetite. In this context, minimizing the tax risk is one of the Group's objectives, which is disseminated top-down in all countries, including by sharing the RAF, which is the general approach by which a low risk appetite is established, communicated and monitored.

In the taxation area more specifically, the Group has a Tax Risk Policy and a Tax Control Framework (TCF) whose main objective is to provide unambiguous and consistent guidance to the Tax Units in the management of tax issues.

In this regard, in accordance with the tax strategy, specific guidelines and methodological rules on evaluation have been established so as to assess, monitor and manage the relevant tax risk for the companies consistently, in the knowledge that the Group companies operating in different jurisdictions must adopt the TCF with respect for the specific corporate context and domestic regulations of each country in question.

The task of the TCF is to identify sources of tax risk to ensure (i) effective and prompt management of tax compliance and (ii) that the choices made are not aggressive, but rather prudent, in the presence of interpretative issues of an uncertain nature. Processes and activities have therefore been mapped in order to weave a network of risk detectors associated with the resulting control measures. In particular, as the set of detectors and control measures identify sources of risk, the TCF can perform a broad spectrum of control. As such, any materialization of the tax risk can be intercepted and managed by each Tax unit in question.

The TCF is also subjected to audit by the Internal Control System which recognizes its adequacy.

Furthermore, the effectiveness of the TCF and its ongoing updates is ensured through periodic monitoring of the risk map at a centralized level, as well as through the controls performed by the tax authorities under the cooperative compliance regimes, where implemented. The outcome of the monitoring of tax risks is periodically brought to the attention of the competent corporate bodies (Control and Risk Committee[14]), with which the most significant positions and the related mitigation actions are shared from time to time.

(13) Line of defense, Group Risk Committee, Specific risk committee, Risk Appetite Framework, Policy and Reporting.

(14) In particular, in order to implement the recommendations of the Corporate Governance Code, as well as to optimize its work, the Board of Directors of Enel SpA has established an internal Control and Risk Committee. The Committee receives a constant flow of information regarding, for example: the risk management and control system (including tax risk), the Tax Transparency Report, the Report on the tax risk management and control system in the context of the regimes for cooperative compliance with the tax authorities and the tax strategy.

Tax Risk Policy – Risk management

DETECTION	MEASUREMENT	MANAGEMENT
Constant detection during processes based on risk maps in relation to sources and areas of risk (*e.g.*, compliance and interpretation of tax regulations).	Tools to measure risk with defined metrics that estimate its impact with reference to certain materiality thresholds[15], while also considering qualitative aspects (related to corporate reputation and administrative/ civil/criminal liability).	In relation to the degree of exposure to risk, specific control measures must be taken[16] to guarantee and duly document the sharing of the tax position following internal decision-making escalation processes, supported, where necessary, by external clearing[17].

Where applicable, the tax control system is subject to external certification, as in the case of Spain. In this regard, the subsidiary Endesa obtained certification by AENOR[18] for its Tax Compliance Management System in accordance with the requirements of the UNE 19602 standard. This tax compliance certification represents one of the highest standards by which Spanish companies can demonstrate that they prevent and mitigate tax risks by fully meeting the requirements of UNE 19602[19]. In Italy, the Revenue Agency positively verified Enel's integrated tax risk detection, measurement, management and control system before admitting the companies to the cooperative compliance regime.

Following the results of the tax risk control activities, all uncertain tax positions and any disputes, relating to all types of taxes, which exceed the materiality threshold and the probability of a negative outcome envisaged by the IAS/ IFRS principles, are represented in detail in the Integrated Annual Report, to which you are referred.

Participation in cooperative compliance schemes

COOPERATIVE COMPLIANCE INDEX[20]: 95%

For companies that meet the legal requirements for participation, the Enel Group promotes participation in cooperative compliance schemes where they exist in the various countries in which it operates. In particular, Enel participates in the Collaborative Fulfillment (*Adempimento Collaborativo*) scheme in Italy[21], for larger companies, in the equivalent Code of Good Tax Practices in Spain (*Código de Buenas Prácticas Tributarias*[22]), France, and Portugal, and is collaborating with the federal tax authority in Brazil in a pilot project for the creation of a local Cooperative Tax Compliance model (*Projeto CONFIA – Conformidade Cooperativa Fiscal*[23]).

In addition to the aforementioned countries, monitoring of the existence and potential membership of further cooperative compliance regimes in the countries of operation is ongoing.

Specifically in order to monitor the progress of this activity, an index (the Cooperative Compliance Index – CCI) was developed to measure the participation of Enel Group companies in cooperative compliance regimes in various countries based on their size and membership requirements[24].

(15) For risks related to interpretation, the relevant Tax unit has to consider the relevance, certainty, reviewability and relative materiality of interpretative choices.
(16) With regard to compliance risk, the controls designed must achieve the goal of being considered generally capable of mitigating the relevant risks, so that the residual risk is within the tolerance area. If any further tax risks need to be mitigated, the Tax unit must: (i) activate adequate control mechanisms; (ii) help to update the tax risk map in order to avoid any repetition of the cases detected.
(17) External clearing generally refers to forms of advice requested from external professional firms for opinions on the validity of the interpretative solution ("more likely than not"), rulings and/or discussions in the context of cooperative compliance regimes, according to the local rules.
(18) AENOR (Asociación Española de Normalización y Certificación) is a leading body in the certification of management systems, products and services and is responsible for the development and dissemination of UNE standards.
(19) UNE standard 19602, published in February 2019, sets out requirements and guidelines for companies to voluntarily adopt a system that reinforces tax compliance best practices. The standard requires companies to identify and assess potential tax risks and to minimize them by establishing financial controls and due diligence processes for the organization's exposed personnel and suppliers, as well as a channel for complaints and consultations.
(20) The CCI for 2023 is slightly down on the figure for 2022 (95.7%), due to the significant reduction in the Group's revenues, mainly in Spain and Italy (countries where numerous companies have joined the cooperative compliance regime), which is greater than in other countries. Despite the slight decrease in the index, several additional companies have joined the cooperative compliance regimes in Italy and Portugal.
(21) https://www.agenziaentrate.gov.it/portale/web/guest/schede/agevolazioni/regime-di-adempimento-collaborativo/elenco-societa-ammesse-al-regime.
(22) https://sede.agenciatributaria.gob.es/Sede/colaborar-agencia-tributaria/relacion-cooperativa/foro-grandes-empresas/codigo-buenas-practicas-tributarias/adhesiones-codigo-buenas-practicas-tributarias.html.
(23) https://www.gov.br/receitafederal/pt-br/acesso-a-informacao/acoes-e-programas/confia.
(24) The index compares the revenues of companies that have joined the existing cooperative compliance schemes to those of all Enel companies legally eligible to join. The index does not consider countries in which the schemes have not been legally established, or companies that do not meet qualifications to join (*e.g.*, because their size is below statutory thresholds), even though the schemes exist in their countries. Nevertheless, the Group's overall coverage for the year was more than 70% in terms of cooperative compliance companies' revenues compared to the Group's revenues.

Mechanism for stakeholder reports

For the Enel Group, tax compliance is considered a key aspect of the Company's ethical and accountable management. As such, breaches that can be reported through the Company's internal channels also include those relating to tax. The Group's Code of Ethics is the framework of "ethical management" which Enel operates, tying in fully with the tax strategy. Provisions for violations of the Code of Ethics are appropriate to ensure the effectiveness of the requirements contained therein and should be understood to extend to the provisions of the tax strategy.

Additionally, all stakeholders can send in their remarks, questions and opinions on tax issues using the contact information channels provided by Enel and available on the website: (https://www.enel.com/media/explore and https://www.enel.com/investors/overview).

Transparent relations with stakeholders

The constant commitment of the Enel Group to transparency with respect to the tax authorities and all stakeholders concretely underlines the importance it attributes to the tax variable and its role in the sustainable development of the Company. Therefore, the Group is committed to providing a transparent explanation of the tax issues that can be of interest to third parties, also on its website, making the latter an information hub that is easily accessible and understandable to all.

The Enel Group ensures transparency and integrity in its relations with tax authorities, in the event of audits on both the Group companies and third parties. To consolidate this transparency with tax authorities, the Enel Group promotes engagement in cooperative compliance schemes for companies that integrate the requirements of their respective domestic regulations in order to reinforce their relations. It also complies with the transfer pricing documentation provisions in accordance with OECD Guidelines, taking the "three-tiered approach", divided into Master File, Local File and Country-by-Country Report. Moreover, to avoid double taxation, the Group promotes amicable procedures for the settlement of international disputes (Mutual Agreement Procedure – MAP) or bilateral agreements (Bilateral Advance Pricing Agreements – BAPA), which include the direct involvement of tax authorities from the contracting countries.

Furthermore, its commitment to transparency is also reflected with regard to customs. In this regard, some of the most active companies in dealing with customs authorities (Enel Global Trading SpA and Enel Produzione SpA) obtained the status of Authorized Economic Operator (AEO) respectively in 2016 and 2015. Those qualified as an AEO are deemed to be trustworthy entities due to them having demonstrated an adequate level of compliance of their processes. Said qualification requires compliance with certain criteria, including "customs and tax compliance", to be demonstrated and maintained through an appropriate level of control and training.

Finally, in 2023, Enel was included for the first time in the VBDO Tax Transparency Benchmark, an index that measures good tax governance practices for 116 listed companies[25], scoring 35 out of 40 points, ranking second among European companies committed to tax transparency and first among Italian ones.

Even in the specific area of electric utilities, Enel was rated among the best companies in terms of sustainability reporting on fiscal matters[26].

This commitment to transparency also extends to the Group's other listed companies. For example, Endesa has once again topped the best practice ranking for transparency and tax responsibility according to the Contribution and Transparency Report 2022 published by the Haz Foundation, while Enel Américas and Enel Chile were the two Chilean companies with the highest degree of compliance in the Chilean Corporate Fiscal Sustainability Report for 2021[27].

(25) The VBDO Association represents the interests of around 80 institutional investors and 500 private investors who want to contribute to the sustainable development of the capital market. The Tax Transparency Benchmark 2023 report, now in its ninth edition, looked at companies headquartered in Belgium, Denmark, France, Germany, Italy, Spain, and Sweden that operate in the financial, energy, pharmaceutical, technology, and consumer goods sectors (https://www.vbdo.nl/wp-content/uploads/2023/11/Transparency-Benchmark-rapport-2023_def.pdf).

(26) Cfr. Prof. Manuel Castelo Branco, Prof. Delfina Gomes, Prof. Adelaide Martins, Exploring Tax-related Sustainability Reporting by Electric Utilities, in "Utilities Policy", of May 3, 2023.

(27) Based on the fiscal sustainability analysis published in 2023 by Prof. Antonio Faúndez-Ugalde of Pontificia Universidad Católica de Valparaíso.

Tax advocacy

Enel consistently acts with a transparent and collaborative approach with all national and international institutions and trade associations to support the development of effective tax systems in the various countries where it operates. In this regard, please refer to the "Transparency in institutional processes" paragraph.

In particular, Enel supports fair, effective and stable tax systems in order to reduce uncertainty for both governments and companies. Enel believes that a transparent and coordinated approach between countries is essential to improve the international tax system and it promotes a consensual approach to regulatory choices. To this end, it contributes by supporting governments and international organizations through active participation in public consultation phases on new regulatory processes, where they exist, either directly or through participation in various national and international associations. Regularly sharing knowledge and best practices through participation in national and international associations is essential in order to contribute to the development of new regulatory procedures by providing qualified technical support on complex business matters.

In this respect, the most representative organizations in the various countries in which Enel has been involved for years to support the evolving tax legislation are: Assonime[28], EuropeanIssuers[29], Confindustria[30], Foro de Grandes Empresas[31], SOFOFA[32], ICDT[33], ANDI[34], GETAP[35], CONFIA[36], Acolgen[37] and Andesco[38].

With regard to tax responsibility and transparency, since 2023, Enel has participated in a CSR Europe project[39] for a collaborative platform aimed at developing an index to assess the performance of companies in all sectors in terms of tax transparency and responsible fiscal behavior.

In 2019, furthermore, Enel joined the **European Business Tax Forum** (EBTF), an association that aims to facilitate a public debate on taxation by providing a balanced and comprehensive perspective of the taxes paid by companies. In view of this objective, tax information and data are provided to the various stakeholders concerned. On its website (https://ebtforum.org), the Forum continuously publishes various studies on tax transparency: Total Tax Contribution[40], Best Practices for Good Tax Governance[41] and Tax Transparency and Country by Country Reporting.

In 2021, Enel signed up to the **B Team Responsible Tax Principles**, namely, the principles developed by B Team[42] to promote responsible and sustainable tax practices for a better future. B Team is an organization created by a group of multinationals, with the contribution of civil society, investors and representatives of international institutions, in order to promote responsible and sustainable tax practices. Through its active and public participation in all these associations, Enel believes it can make its own technical contribution by sharing its experience in support of fair, effective and sustainable taxation.

Reporting

Acting with honesty and integrity is one of the main cornerstones of Enel tax strategy, as is its commitment to transparency.

The publication of **Country-by-Country Reporting (CbCR)** supplemented with **details of the overall tax contribution in the main economies in which the Group operates** (hereafter also "Tax Transparency Report"), underlines the importance that the Group attaches to tax related issues, to their social role and, in general, to transparency as a factor that facilitates sustainable development.

The approach followed also aims to eliminate potential ambiguities that may derive from complex accounting and tax treatments, while supporting and, at the same time, improving other annual financial information and continuing along a pathway targeted at supplying an increasingly in-depth and clear vision of Enel's tax position.

(28) https://www.assonime.it/EN/Pages/Home.aspx.
(29) https://www.europeanissuers.eu/.
(30) https://www.confindustria.it/en.
(31) https://sede.agenciatributaria.gob.es/Sede/colaborar-agencia-tributaria/relacion-cooperativa/foro-grandes-empresas.html.
(32) Sociedad de Fomento Fabril, a trade union federation representing all industry and commerce in Chile: https://www.sofofa.cl/.
(33) Colombian Institute of Tax and Customs Law: https://icdt.co/.
(34) National Association of Industrialists in Colombia: www.andi.com.co/.
(35) Grupo de Estudos Tributários Aplicados (GETAP) in Brazil: https://www.getap.org.br/.
(36) Conformidade Cooperativa Fiscal (https://www.gov.br/receitafederal/pt-br/acesso-a-informacao/acoes-e-programas/confia) and with the main associations for the electricity sector in Brazil.
(37) Asociación Colombiana de Generadores de Energía Eléctrica: https://acolgen.org.co/.
(38) Asociación Nacional de Empresas de Servicios Públicos y Comunicaciones: https://andesco.org.co/.
(39) https://www.csreurope.org/newsbundle-articles/csr-europe-launches-new-collaborative-platform-on-tax-responsibility-and-transparency.
(40) Several studies have been published relating to the EU/EFTA Total Tax Contribution, which report the yearly aggregate data for the various types of taxes paid by the largest European multinational companies by turnover and/or by stock market capitalization.
(41) The paper was drafted by a group of tax directors from three organizations (Tax Executives Council of the Conference Board, B Team and European Business Tax Forum) to provide guidance on the best practices that multinationals can adopt in order to develop transparency and assurance vis-a-vis their stakeholders.
(42) https://bteam.org/.

As of 2019 (FY2018-2017), Enel has adopted a Total Tax Contribution model for the main countries where it operates, providing evidence of taxes paid and of withholding tax deductions.
As of 2021 (FY2020), on the other hand, Enel has adopted an integrated model: the Tax Transparency Report, which is prepared in accordance with the rules set out for OECD Country-by-Country Reporting[43] and includes information and data for Total Tax Contributions in the main countries where it operates.
The integrated model of the Tax Transparency Report is available on Enel website (https://www.enel.com). The Group believes that this model ensures a broad vision and a detailed measurement of the organization's contributions to economic and social development in the regions/countries in which it operates.

Tax Transparency Report - principles

The Tax Transparency Report adopts the **cash basis accounting criterion** as a general principle for representing tax data, considering it to be the most adequate for disclosing the actual tax contribution. More specifically, the total tax data, as defined and detailed in what follows, is determined through the various taxes paid[44] by all the entities in the scope of each tax jurisdiction in the year subject to reporting, regardless of the tax year to which the taxes refer.
As anticipated previously, on applying an approach adopted by the OECD[45], the Tax Transparency Report classifies the different taxes into categories and distinguishes them between those that constitute an expense for the Company (**taxes borne**) and those that the Company pays due to rebate mechanisms, substitution, etc. (**taxes collected**) but that, at any rate, are the result of the Company's own economic activities. Specifically, taxes, both borne and collected, are classified into the following five macro-categories.
Profit – Income taxes: this category includes taxes on company income that can be both borne (*e.g.,* tax on the income of companies at state or local level, taxes on production, solidarity contributions, tax levied on income deriving from specific activities such as the extraction of natural resources, the generation and sale of hydroelectric energy as well as taxes withheld at source) and collected, in the case where they are applied to a third party or to a physical person (*e.g.,* withholding taxes on interest income, royalties, subcontractors and suppliers). Income taxes do not include taxes on dividends paid by Enel Group entities.
People – Taxes on labor: this category generally includes taxes on labor, comprising those on incomes and social welfare contributions. Taxes applied to the employer are considered taxes borne (*e.g.,* social welfare contributions, health insurance, pensions, disability contributions), while income taxes applied to workers are considered as taxes collected (*e.g.,* taxes on incomes of physical persons or social welfare contributions debited to workers that are normally withheld by the employer).
Products – Taxes on products and services: indirect taxes applied on production, sale or use of goods and services, trade and international transactions. This category includes taxes that can be paid by businesses with reference to their own consumption of goods and services, regardless of the fact that they are paid to the supplier of the goods and services rather than directly to the government. This category includes both Taxes Borne (*e.g.,* taxes on consumption, turnover taxes, excise duties[46], customs duties, import duties, taxes on insurance contracts, non-deductible VAT) as well as Taxes Collected (*e.g.,* VAT paid, excise duties[47], taxes on goods and services).
Property – Property taxes: taxes on property, the use or transfer of property, plant and equipment or intangible assets. This category includes both taxes borne (*e.g.,* taxes on property and the use of real estate, capital tax applied on the increase of risk capital, taxes on the transfer, purchase or sale of assets, net equity and capital transactions, stamp duty, stamp duty for the transfer of real estate, stamp duty for the transfer of shares, taxes on financial transactions that imply loans or borrowings from a foreign source), and taxes collected (*e.g.,* taxes on leases collected by the lessor and paid to the government).

(43) As of 2018, the Enel Group has presented Country-by-Country Reports – CbCRs (for the years 2016-2022) through the Italian Revenue Agency, which has in turn supplied them to the other States with which an agreement is in force for the exchange of information, in compliance with the indications of Action 13 of the BEPS project, as amended. Action 13 is a project in which the OECD and the countries of the G20 have participated in order to reply in a coordinated and shared manner to the strategies of aggressive tax planning put in place by MNEs with a view to "artificially shifting" profits in jurisdictions characterized as tax havens.
(44) The data for taxes paid includes payments on account, taxes for previous years, including after assessments, net of repayments and redemptions obtained. Interest and penalties are not considered.
(45) Working Paper no. 32, "Legal tax liability remittance responsibility and tax incidence".
(46) With the exception of those recorded under environmental taxes (*e.g.*, duties on gas and electric energy).
(47) With the exception of those recorded under environmental taxes (*e.g.*, duties on gas and electric energy).

Planet – Environmental taxes[48]: these include taxes and duties on energy products (including fuel for vehicles), on motor vehicles and transport services, and on the supply, use or consumption of goods and services considered harmful to the environment, as well as the management of waste, noise, water, land, soil, forests, biodiversity, wild animals and fish stocks to be paid by the entity. Examples of taxes borne are: taxes on the value of the generation of electricity, taxes on the production of nuclear fuels and carbon tax. Examples of taxes collected are: taxes on electricity, taxes on hydrocarbons and duties on gas and electricity.

Furthermore, the financial-equity data represented follow the **accounting requirements** below.

Data source: the data represented in the report are expressed on the basis of IFRS-EU accounting principles adopted by the Group and are at stand-alone entity level. Subsequently, these data are aggregated by tax jurisdiction. To take account of intercompany relations, the data are represented according to logic of aggregation by tax jurisdiction (that is, the country in which the entities are resident for tax purposes and where they enjoy fiscal autonomy) and not according to a logic of consolidation.

Entities within the scope: falling within the scope of the report are all those companies consolidated using the full consolidation method or the proportional method (hereafter also "entity within the scope") on the basis of accounting principles used for the drafting of the Consolidated Financial Statements on the part of the Ultimate Parent Entity (Enel SpA)[49]. With reference to the list of companies in the Group and their activities, please refer to the specific prospectus in the Integrated Annual Report 2023[50].

Currency: the report considers the euro as the currency of reference in that it is the one used by the Parent Company. Since IFRS-EU accounting data are extracted in local currencies, economic data (such as revenues, Earnings Before Taxes, taxes accrued and taxes paid) have been converted into the euro at the average exchange rate of the currency, while balance sheet data (property, plant and equipment) have been converted into the euro at the exchange rate in force at year's end.

Third party revenues: the sum of Third party revenues accounted for by the entities within the scope in the pertinent tax jurisdiction in the reporting year. The term "revenues" is understood in the broadest possible[51] sense to include all revenues, comprising those from extraordinary operations.

Cross-border intercompany revenues: the sum of revenues from transactions carried out between entities within the scope resident in different jurisdictions in the tax reporting year, including income from extraordinary operations and excluding dividends[52].

In-Country intercompany revenues: the sum of revenues from transactions carried out between entities within the scope resident in the same jurisdiction in the tax reporting year, including income from extraordinary operations and excluding dividends[53].

Profit (Loss) before income taxes: the sum of Profits (Losses) before income taxes generated in the year of reference and involving all entities within the scope in each tax jurisdiction. The Profits (Losses) before income taxes must include all items involving revenues and extraordinary costs[54].

Income taxes accrued for companies (current taxes): the sum of Current Taxes (*i.e.*, for the year in progress) on Taxable Income in the reporting year of all entities within the scope in each tax jurisdiction, regardless of whether or not they have been paid. The data for these does not take account of provisions for tax debts that are not yet certain as regards either their amount or existence, of adjustment of current taxes for previous years and of prepaid and deferred taxes. Income taxes do not include taxes on dividends paid by Enel Group entities.

Deferred taxes: the sum of deferred taxes on the tax-

(48) The classification of taxes as environmental is based on the shared definition within the harmonized statistic framework developed jointly, in 1997, by Eurostat, the European Commission, the Organisation for Economic Co-operation and Development (OECD), and the International Energy Agency (IEA), according to which environmental taxes "are taxes whose tax base is a physical quantity (or the proxy of a physical quantity) of an element that has a proven and specific negative impact on the environment.(https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Environmental_tax). All taxes on energy, transport, pollution and resources are included, whereas all taxes on added value are excluded. For further details, see: Eurostat, "Environmental taxes – a statistical guideline", par. 2.3 e 2.6 (https://ec.europa.eu/eurostat/documents/ 3859598/5936129/KS-GQ-13-005-EN.PDF); and OECD, Special feature: Identifying environmentally-related tax revenues in Revenue Statistics (https://www.oecd-ilibrary.org////sites/52465399-en/index.html?itemId=/content/component/52465399-en#).

(49) However, the companies consolidated using the equity method are excluded. Furthermore, the data of Permanent Establishments are reported in the jurisdiction of their operations and not in the jurisdiction of residence of associated companies. Therefore, the data of the latter do not include the data of the Permanent Establishment. Finally, stateless companies in the Enel Group are flow-through entities incorporated in the same country in which income is imputed and is effectively taxed in the partner company (*e.g.*, the United States).

(50) See Assonime circular no. 1/2021. *Gli obblighi di trasparenza in materia di tassazione nelle dichiarazioni non finanziarie secondo lo standard GRI 207* (Transparency obligations in the matter of taxation in Non-Financial Disclosures according to standard GRI 207), where it is clarified that it is possible to make reference to other sources (known as "incorporation by reference") such as the Directors' Report in the Consolidated Financial Statements or in the annexes for the list of Group companies and their main activities, and the Directors' Report or other sections of the NFD with regard to information already contained therein on uncertain tax positions and on any other information relevant for the purposes of GRI 207. With reference to the list of shareholdings, it is confirmed that the country of the registered office shown also corresponds to the tax residence.

(51) Specifically, also included are (i) other income, (ii) all extraordinary income (*e.g.*, capital gains from the sale of real estate, unrealized capital gains/capital losses) and (iii) financial income (with the exception of dividends from other companies within the scope) or any extraordinary item. Revenues from Income Taxes (deriving from deferred tax liabilities or from tax consolidation) are excluded.

(52) Revenues do not include payments received from other entities within the scope that are considered dividends in the tax jurisdiction of the paying subject.

(53) Revenues do not include payments received from other entities within the scope that are considered dividends in the tax jurisdiction of the paying subject.

(54) Consistent with the reporting criteria applied to revenues, profits (losses) before income taxes are indicated net of dividends paid by the companies within the scope (as also indicated by the OECD in the report "Guidance on the Implementation of Country-by-Country Reporting" published in 2019 point II.7).

able income in the reference year for all entities within the scope in each tax jurisdiction. Deferred taxes are taxes paid in advance or which will be paid in the future and generated by temporary differences, which bring forward or postpone taxation.

Tangible assets: the sum of net accountable values of tangible fixed assets resulting from the balance sheet, of all entities within the scope in each tax jurisdiction[55].

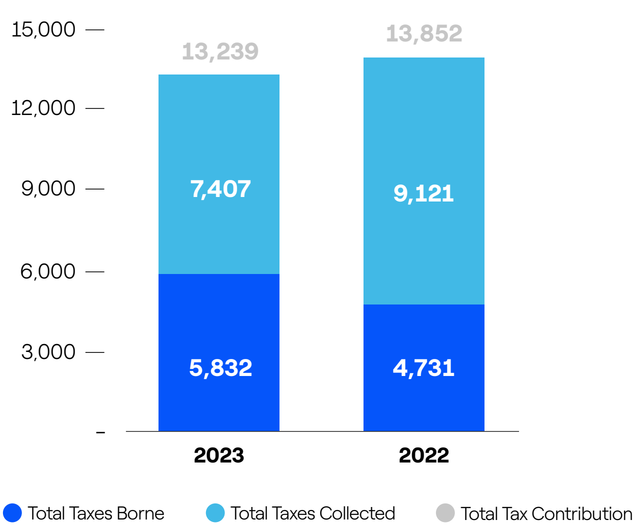
Number of employees and remuneration: the number of employees at the end of the period considering all the entities within the scope; conversely, as regards their remuneration, please see the Sustainability Report as well as the Tax Transparency Report.

Stated capital: the sum of the share capital and capital reserves of all entities within the scope in each tax jurisdiction.

Accumulated earnings[56]: this item represents the amount of net profit realized by the entities within the scope in each tax jurisdiction over the past years, net of dividends paid and any other reduction due to losses, capital increases, etc.

Tax Transparency Report – general analysis

TOTAL TAX CONTRIBUTION (MIL EUROS)



In 2023, the **Total Tax Contribution**[57] (**TTC**), with respect to all the countries in which the Group operates, was **13,239** million euros, down by a total of **613**[58] million euros (**-4.4%**) compared to 2022[59].

This trend is the result both of the **increase** in **Taxes Borne** and the reduction in **Taxes Collected**, which reflects the **economic conditions of the reference market** where lower volumes of energy were sold at decreasing average prices.

In this context, there was a significant overall contraction in indirect taxes related to revenues while there was (i) significant growth in taxes related to profits and (ii) a more moderate increase in labor and property taxes. More specifically, an **analysis of the Total Tax Contribution data** broken down into the five tax categories shows:

a. a significant **reduction in taxes on products and services**, mainly due to the aforementioned fall in revenues, partially offset by the payment of an extraordinary solidarity contribution[60] in Spain;
b. an **increase in taxes on profits** due to (i) income generated by extraordinary operations in Chile, (ii) the effects arising from the income tax payment on account and balance payment mechanisms[61] and (iii) the payment in Italy of the solidarity contribution[62] and the extraordinary contribution to mitigate the high cost of utility bills[63];
c. an **overall reduction in environmental taxes**, for the same reasons that affected the value of taxes on products and services;
d. an **overall trend in property taxes and labor taxes**, consis-

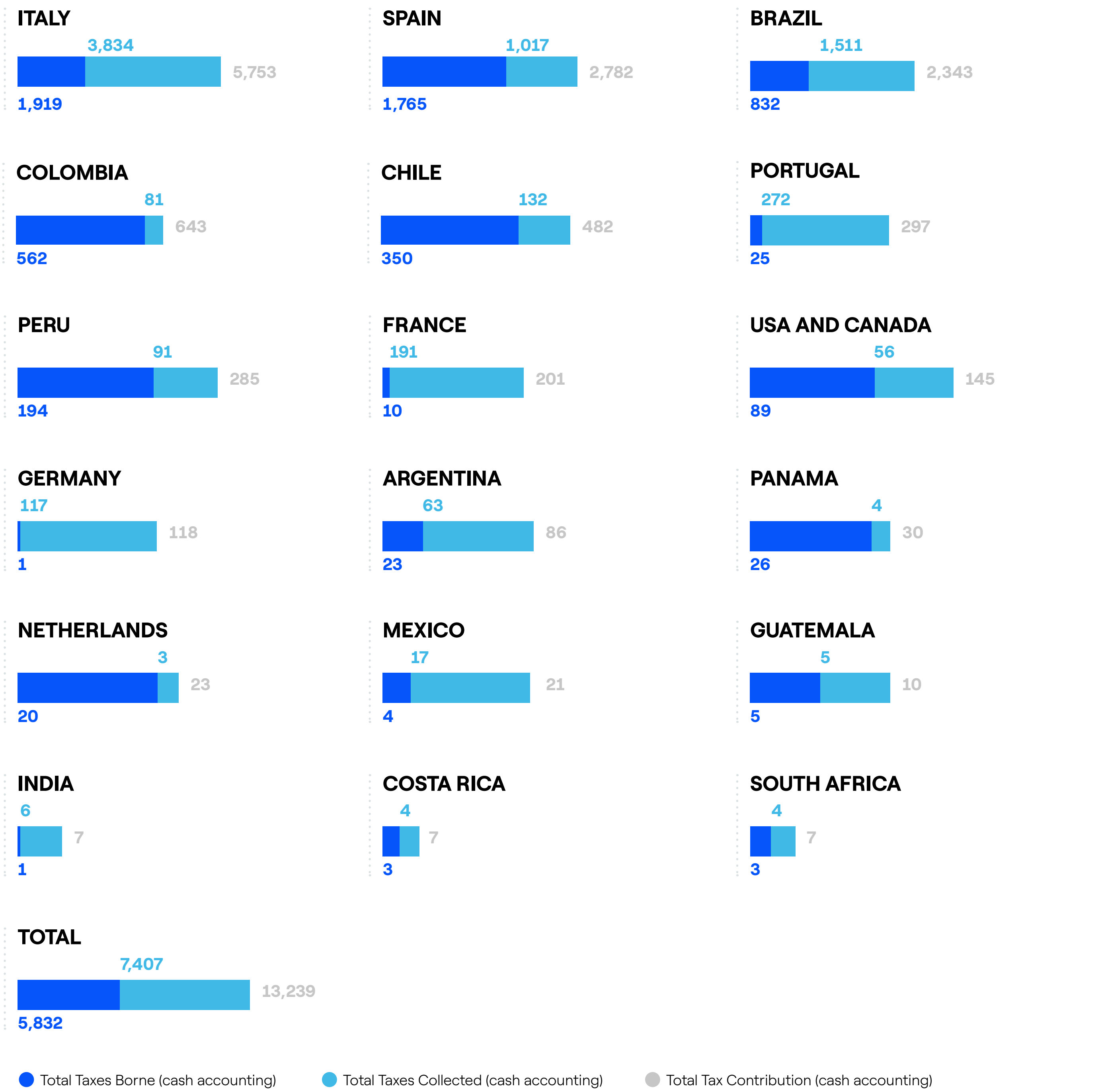
(55) Tangible fixed assets do not include cash and cash equivalents, intangible assets or financial assets.
(56) The introduction in the Sustainability Report of the disclosure on "Accumulated earnings" supplements the disclosure required by Directive 2013/34 (amended by Directive (EU) 2021/2101) on the publication of income tax information (the so-called public CbCR). The information thus supplemented brings forward the disclosure of such contents with respect to the terms established by article 48 *octies* of the aforementioned Directive.
(57) The Total Tax Contribution has been calculated considering the main countries in which the Group is present. These represent around 98% of revenues and more than 99% of income taxes paid. However, for all other countries, corporate income taxes are shown in detail in the following tables. The scope of the countries included in the calculation of the total 2023 tax contribution was slightly reduced compared to the previous year due to the exclusion of Romania and Greece as a result of the sales that occurred during the year, which produced a restatement of the 2022 data. The following countries are included in the TTC: Italy, Spain, Brazil, Colombia, Chile, Portugal, Peru, France, United States, Canada, Germany, Argentina, Panama, the Netherlands, Mexico, Guatemala, India, South Africa and Costa Rica.
(58) The sum or the difference between some values may not correspond to the total due to rounding.
(59) It should be noted that refinements and changes to the scope of consideration have been introduced for the purpose of preparing this section of the document. The 2022 figures presented in this document may not coincide with that represented in the Enel Group's "Sustainability Report 2022".
(60) This is the contribution introduced in Spain by Law no. 38 of December 27, 2022.
(61) In the majority of countries where Enel operates, Income Taxes are paid for the reporting year based on the historical values of the previous year (so-called historical method). Therefore, the financial effects of the overall value of Income Taxes for the reporting year are not fully known until the following year. In some situations, however, as shown in the analysis below, income taxes on account are paid for the reporting year based on the projected results for that year (so-called forecast method). In such circumstances, the financial effects of income taxes are already reflected in the reference year, albeit not in their entirety.
(62) Solidarity contribution required by Law no. 197 of December 29, 2022.
(63) Solidarity contribution borne by energy companies under Law no. 51 of May 20, 2022.

tent with investment, employment and staff remuneration levels.

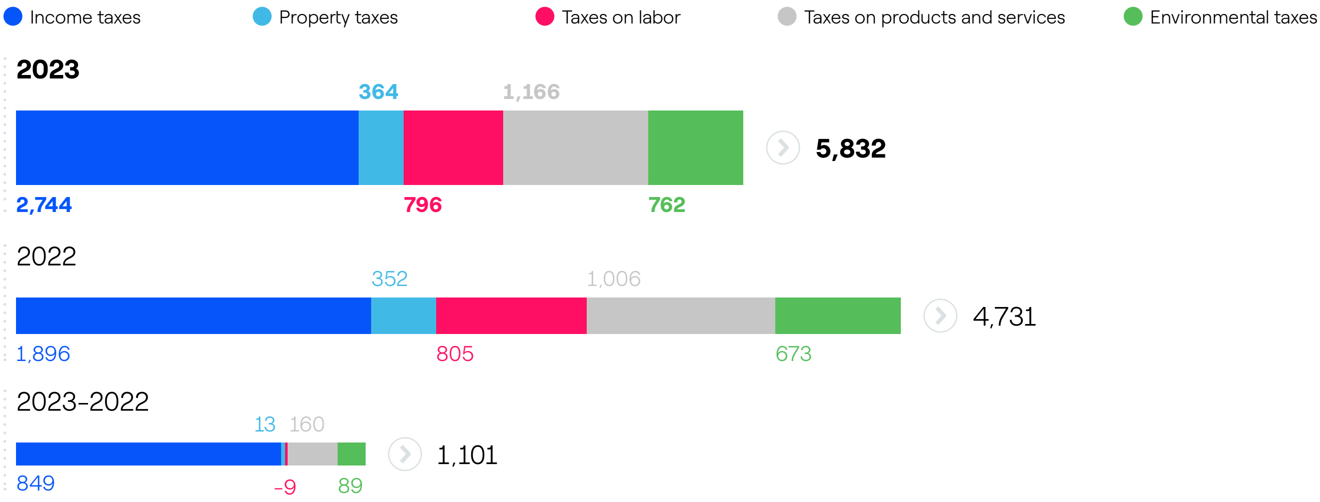
In general, the **value of taxes paid** highlights once again the importance of the **Group's tax contribution** to the **communities** and the economic and social systems of the countries in which it operates, something which has become even more relevant as we face the challenges of the post-pandemic period and the uncertainties caused by the geopolitical situations in Ukraine and the Middle East.

TOTAL TAX CONTRIBUTION BY COUNTRY (MIL EUROS)

An analysis of the tax contribution from a **geographical perspective** confirms that the **distribution** of taxes paid is **consistent** with that of the **revenues generated** and the number of **staff employed**: **Italy, Spain and Brazil** together account for around **82%** of the **tax contribution**, **78%** of **revenues** and **80%** of **employees**.



TAXES BORNE (MIL EUROS)



In 2023, the **Total Taxes Borne**[64] amounted to **5,831.9 million euros**[65], an overall increase of **1,100.7 million euros (+23.3%)** compared to 2022.

This increase affected **most categories of taxes borne** and especially **taxes on profits**, **taxes on products and services**, and **environmental taxes**. There were smaller changes in property taxes (slightly up) and labor taxes (slightly down).

The amount of **income taxes** paid **increased** overall by **848.8 million euros**. The **largest increases** were recorded in:

- **i.** Chile (+246.2 million euros), due to higher income from the proceeds of the sale of Enel Transmisión Chile, a company that operated in the electricity transmission business in Chile;
- **ii.** Spain (+224.5 million euros), as a result of (i) higher balances and advances paid in relation to the better final results between 2022 and 2021 and the better results expected for 2023 compared to 2022, respectively[66]; (ii) new limitations introduced for 2023 on the use of tax losses of companies participating in Endesa's tax consolidation; and (iii) lower tax-deductible depreciation and amortization in relation to coal-fired production plants;
- **iii.** Italy (+146.2 million euros), due to (i) the payment of the 2023 solidarity contribution on profits of companies operating in the energy sector, as required by Law no. 197/2022, and the remaining portion of the extraordinary contribution for high bills in 2022, as required by Law no. 51/2022 (+612.9 million euros in total), (ii) higher withholdings on payments incurred abroad (+35.9 million euros) and (iii) lower IRES advances paid compared to 2022[67] (-509.8 million euros);
- **iv.** Colombia (+129.7 million euros), due to an increase in taxable income and the tax rate between 2021 and 2022, the taxes for which were paid in 2023;
- **v.** Peru (+54.6 million euros), mainly due to the effect of greater advance payments resulting from an increase in income expected for 2023 compared to 2022;
- **vi.** Brazil (+50.8 million euros), which was affected in 2022 by the change in the tax settlement mechanism[68], resulting in smaller payments. The amount of income taxes paid also reflects the increased taxable income.

For the sake of completeness, it should be pointed out the lower income taxes paid in (i) Argentina (-14.7 million euros), where the 2022 payments also included advances relating to companies subsequently sold (Enel Generación Costanera and Central Dock Sud), and (ii) Panama (-5.6 million euros), due to a reduction in taxable income between 2021 and 2022, the taxes for which were paid in 2023.

The payment of **taxes on products and services increased by 160.1 million euros**, as a result of:

- higher payments in (i) Spain (+161.9 million euros), following the introduction of the "Gravamen temporaneo energético", an extraordinary solidarity contribution related to sales made by companies operating in the energy sector, and (ii) Colombia (+20.8 million euros),

(64) Taxes Borne are taxes that constitute a cost to the company.
(65) For the countries covered by the TTC analysis, Taxes Borne include, among income taxes, specific taxes on corporate income (Corporate Income Tax) of 2,684.4 million euros in 2023 and 1,837.3 million euros in 2022.
(66) In this specific case, the advance payments (calculated using the forecasting method) paid in 2023 increased due to higher expected income in 2023 than in 2022, while the balances paid in the same year increased due to higher taxable income between 2021 and 2022.
(67) In this specific case, the entities forming part of the national tax consolidation of Enel SpA in 2022 had paid significant advances (calculated on the basis of the forecast method) due to a greater income expected between 2022 and 2021, while in 2023 they paid reduced advances (calculated based on the historical method).
(68) Some Brazilian entities changed the frequency of income tax settlement from annual to quarterly during 2022. This change resulted in taxes relating to the last quarter of 2022 being paid in January 2023.

mainly attributable to the non-deductible VAT on major purchases made;

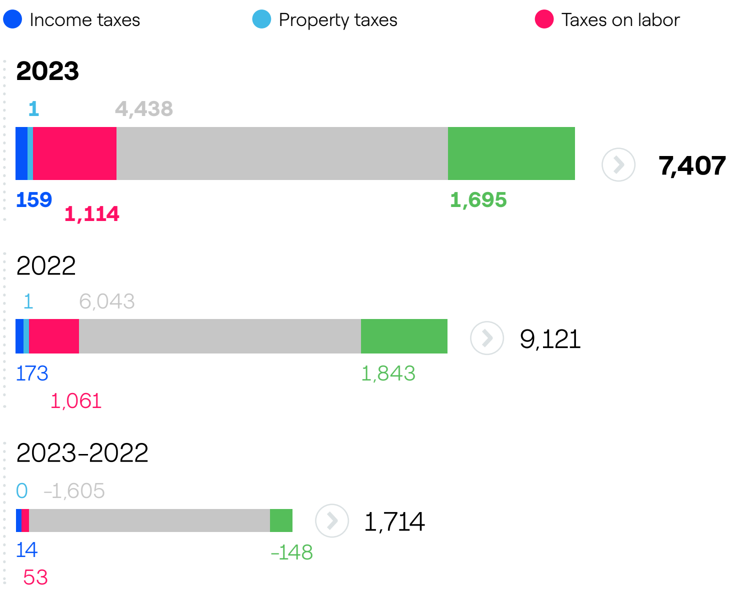
- lower payments in (i) Chile (-11.8 million euros), where stamp duty had been paid on financial transactions in 2022, and (ii) Brazil (-11.6 million euros), where, following the sales of some companies, the payments of the ICMS ("Imposto sobre Circulação de Mercadorias e Serviços") and the social taxes PIS ("Programa de Integração Social") and COFINS ("Contribuição para Financiamento de Seguridade Social") were reduced.

The payment of **environmental taxes increased** overall by **88.5 million euros**. The most significant changes were recorded in:

i. Italy (+63.3 million euros), due to excise duty payments on coal relating to 2022, the year in which the outbreak of the geopolitical crisis in Ukraine led to poor gas availability with a resulting greater use of coal-fired generation;
ii. Spain (+35.5 million euros) and Chile (-15.3 million), where in 2023 (for Spain) and 2022 (for Chile), taxes relating to previous years were paid following a redetermination of the same. The lower taxes paid in Chile in 2023 are also a consequence of the reduction in the energy generated from thermoelectric sources.

The payment of **property taxes** increased overall by **12.8 million euros**. The most significant increases were recorded (i) in Italy (+10.9 million euros), due to the tariffs of the single property fee being updated in line with inflation, and (ii) in the United States of America (+9.6 million euros) due to the new renewable energy plants in the states of Texas and Oklahoma coming into operation. Partially offsetting these were the reductions in property taxes (i) in Brazil (-5.3 million euros), where one-off property taxes were paid in 2022 in relation to financial operations (settlement of foreign financial debts and capital injection), and (ii) in Spain (-2.1 million euros), due to the reduction in the tax on the occupation of public land.

TAXES COLLECTED (MIL EUROS)



Total Taxes Collected amounted to **7,407.5 million euros**, up **1,713.9 million euros (-18.8%)** compared to 2022.

The reduction in tax collected is essentially due to the **lower taxes on products and services**, totaling **1,605.2 million euros**, and the lower **environmental taxes** for **148.3 million euros**, both influenced by the significant contraction in revenues due to (i) the lower quantities of energy produced and sold, (ii) decreasing average sales prices and (iii) some companies exiting the Group's scope[69].

More specifically, the decrease in taxes on products and services was concentrated (i) in Spain (-679.3 million euros), where payments decreased mainly due to the reduction in the VAT rate on natural gas starting from the month of October 2022, (ii) in Brazil (-655.3 million euros), where ICMS payments decreased due to lower revenues (following the exit from the Group scope of some entities sold in 2022) and the reduction of the rate applied starting from the second half of 2022, (iii) in Italy (-269.3 million euros), mainly due to the lower VAT advance payment for 2023, determined on the basis of the historical method based on the December 2022 payment, and iv) in Argentina (-83.8 million euros), where VAT payments and municipal taxes

(69) Including Enel Goiás and CGT Fortaleza in Brazil and Enel Generación Costanera and Central Dock Sud in Argentina, sold in 2022.

reduced mainly due to the exit from the Group scope of some entities sold in 2022.
The reduction in environmental taxes instead mainly affected Italy (-145.9 million euros), where payments of the excise duty on electricity, gas and the related regional surcharge decreased following the reduction in the quantities of energy and gas sold between 2021 and 2022.
However, the following were recorded:

i. higher taxes on products and services in France (+43.1 million euros) and Portugal (+19.2 million euros) and higher environmental taxes in Germany (+16.8 million euros), countries in which, compared to 2022, local markets have shown a growth trend in sales that are subject to these types of indirect taxes; and
ii. higher taxes on products and services in Chile (+52.2 million euros), where in 2022 VAT refunds were received for previous overpayments and fewer VAT payments were made due to increased purchases.

Finally, there were less significant changes affecting labor taxes (**+53.1 million euros**)[70] and taxes on profits (**-13.6 million euros**)[71].

A representative global and concise index of the **Group's tax contribution** from a cash perspective is:

TOTAL TAX RATE

55.8%

The **Total Tax Contribution (TTC Rate) index** provides a concise and complete measurement of the burden for all taxes that the business has effectively paid and is calculated as a percentage of Taxes Borne in relation to Earnings Before such Taxes. The TT rate for 2023 (55.8%) is substantially in line with the average for the previous 5 years (53.7%) due to an increase in taxes borne essentially proportional to the increase in profit before taxes borne.

Another concise indicator of the tax contribution for business income is represented by:

CURRENT INCOME TAX RATE

37.9%

At Group level, in 2023 the **Current Income Tax Rate**, determined as the ratio of accrued corporate income taxes (2.8 billion euros) to earnings before income taxes (7.3 billion euros), was 37.9%, higher than the average rate of the OECD Member States (23.7%)[72].

In line with OECD best practice[73], the following tables show the figure for corporate income taxes paid on a cash basis and the figure for current taxes booked on an accrual basis country by country. Current taxes represent taxes calculated on the basis of income produced in the year following the tax rules of each country and normally deviate from taxes paid in the same year in so far as the definitive payment of the balance is made in the year following that in which they accrued. The trends of the two values are substantially destined to realign over time.
In 2023, the current income taxes on a Group level were equal to 2,767.7 million euros, whereas the income taxes paid were equal to 2,707.3 million euros.

(70) The trend labor taxes is generally consistent with the dynamics of wages and employment levels, with taxes increasing mainly due to the combined effect of (i) higher payments in Italy (+45.0 million euros) and Spain (+17.9 million euros), countries in which, despite the slight reduction in employment levels at the end of the year, wages increased due to contractual adjustments, and (ii) lower payments in Argentina (-12.3 million euros) and in the United States (-4.6 million euros) due to the reduction in staff employed.
(71) Taxes on profits fell due to lower taxes paid (i) in Italy (-24.5 million euros), where withholding taxes were paid in 2022 on transactions with foreign entities not part of the Group, and (ii) in Argentina (-7.6 million euros), attributable to the lower withholdings applied on payments to suppliers due to the sale of Enel Generación Costanera and Central Dock Sud. Partially offsetting this were the higher taxes paid in Chile (+16.8 million euros) due to the application of withholding taxes on the distribution of profits to foreign entities not part of the Group.
(72) Source OECD Stat, "Table II.1. Statutory corporate income tax rate – Combined corporate income tax rate.
(73) For the purposes of Country-by-Country Reporting (BEPS Project – Action 13).

Tax Transparency Report – tables by geographical area

To ensure greater legibility and transparency, below are given the data of the single countries for 2023.

Europe – Main countries

	UM	France	Germany	Italy
Taxes Borne	**mil euros**	**10.1**	**0.8**	**1,918.8**
Profit taxes	mil euros	8.2	0.5	1,077.0
Corporate Income Tax Paid	mil euros	7.9	0.5	1,074.9
Property taxes	mil euros	0.0[1]	–	163.1
Taxes on labor	mil euros	1.9	0.3	539.9
Taxes on products and services	mil euros	0.0	–	2.2
Environmental taxes	mil euros	0.0	–	136.7
Taxes Collected	**mil euros**	**190.9**	**116.9**	**3,834.4**
Profit taxes	mil euros	–	–	2.6
Property taxes	mil euros	–	–	–
Taxes on labor	mil euros	1.2	0.9	688.1
Taxes on products and services	mil euros	140.9	73.8	1,665.6
Environmental taxes	mil euros	48.8	42.3	1,478.1
Total Tax Contribution – TTC (cash basis accounting)	**mil euros**	**201.0**	**117.7**	**5,753.3**
Economic data	**UM**	**France**	**Germany**	**Italy**
Third party revenues	mil euros	1,245.9	443.1	55,393.3
Cross-border intercompany revenues	mil euros	34.6	92.6	472.3
In-Country intercompany revenues	mil euros	–	0.0	35,971.7
Earnings Before Taxes	mil euros	38.4	13.0	4,135.8
Corporate Income Tax Accrued	mil euros	10.3	4.0	1,587.2
Prepaid/Deferred Taxes	mil euros	1.4	4.1	169.2
Tangible assets	mil euros	3.6	0.2	34,178.9
Employees	no.	55	24	31,451
Accumulated earnings	mil euros	-0.0	-31.2	10,585.8
Stated capital	mil euros	2.7	51.2	54,102.2
TT Rate	%	25.0%	6.0%	38.5%
TTC in relation to revenues	%	15.7%	22.0%	10.3%
Taxes Borne in relation to revenues	%	0.8%	0.1%	3.4%
Taxes Collected in relation to revenues	%	14.9%	21.8%	6.9%

(1) Values are stated in millions of euros; zero indicates a value lower than 100,000 euros.

Netherlands	Portugal	Spain	2023	2022	2023-2022	%
20.0	**25.2**	**1,764.9**	**3,739.9**	**3,070.1**	**669.8**	**21.8%**
19.8	24.2	481.9	**1,611.6**	**1,223.8**	**387.8**	**31.7%**
19.8	24.2	450.9	**1,578.3**	**1,191.7**	**386.6**	**32.4%**
–	0.0	97.1	**260.2**	**251.4**	**8.8**	**3.5%**
0.3	1.0	148.1	**691.3**	**678.3**	**13.0**	**1.9%**
–	–	470.8	**473.0**	**311.6**	**161.4**	**51.8%**
–	–	567.1	**703.8**	**604.9**	**98.8**	**16.3%**
3.4	**271.6**	**1,016.9**	**5,434.1**	**6,456.5**	**-1,022.4**	**-15.8%**
–	0.0	78.7	**81.3**	**102.6**	**-21.3**	**-20.7%**
–	0.1	0.3	**0.5**	**0.3**	**0.2**	**54.6%**
1.0	1.7	259.9	**952.9**	**889.8**	**63.1**	**7.1%**
1.5	257.7	581.2	**2,720.7**	**3,634.5**	**-913.8**	**-25.1%**
0.8	12.1	96.7	**1,678.8**	**1,829.4**	**-150.6**	**-8.2%**
23.4	**296.8**	**2,781.8**	**9,174.0**	**9,526.6**	**-352.6**	**-3.7%**
Netherlands	**Portugal**	**Spain**	**2023**	**2022**	**2023-2022**	**%**
1,465.8	1,015.3	25,625.2	**85,188.6**	**146,562.8**	**-61,374.2**	**-41.9%**
1,950.3	287.1	-512.4	**2,324.5**	**8,408.8**	**-6,084.3**	**-72.4%**
1.8	0.2	13,423.1	**49,396.9**	**76,150.7**	**-26,753.8**	**-35.1%**
363.7	49.7	1,412.5	**6,013.1**	**1,000.7**	**5,012.4**	**500.9%**
66.0	11.2	119.9	**1,798.6**	**1,732.4**	**66.2**	**3.8%**
50.5	0.0	104.9	**330.2**	**-81.7**	**411.9**	**504.2%**
0.3	14.2	23,336.1	**57,533.4**	**54,669.7**	**2,863.7**	**5.2%**
18	96	9,347	**40,991**	**41,320**	**-329**	**-0.8%**
-429.3	13.5	32,373.0	**42,511.8**	**43,763.6**	**-1,251.8**	**-2.9%**
11,650.1	18.6	26,879.8	**92,704.7**	**93,968.4**	**-1,263.7**	**-1.3%**
5.5%	49.6%	64.8%				
0.7%	22.8%	11.1%				
0.6%	1.9%	7.0%				
0.1%	20.9%	4.0%				

Europe – Minor countries[74]

Economic data	UM	Greece	Romania	Ireland	Norway	Poland	Turkey	United Kingdom	Russia	2023	2022	2023-2022	%
Third party revenues	mil euros	118.6	2,420.4	12.1	0.2	23.4	0.0	30.3	0.6	2,605.6	3,632.3	-1,026.8	**-28%**
Cross-border intercompany revenues	mil euros	6.9	10.0	4.4	0.5	0.3	0.6	0.7	0.1	23.6	108.2	-84.6	**-78%**
In-Country intercompany revenues	mil euros	7.0	446.9	-	-	0.0	0.0	0.8	-	454.7	680.3	-225.6	**-33%**
Earnings Before Taxes	mil euros	-1.7	302.8	1.7	-0.8	1.5	-4.5	-3.4	-1.8	294.0	-105.9	399.9	**378%**
Corporate Income Tax Accrued	mil euros	4.3	25.4	-	-	0.5	-	-	-2.5	27.8	31.6	-3.8	**-12%**
Prepaid/Deferred Taxes	mil euros	3.2	32.6	-0.1	-	1.5	-	-	-0.0	37.3	-42.3	79.6	**188%**
Corporate Income Tax Paid	mil euros	3.6	18.0	0.0	-	1.1	0.0	-	0.0	22.7	31.9	-9.2	**-29%**
Tangible assets	mil euros	-	-	0.1	0.0	0.4	0.0	1.3	0.7	2.6	2,635.6	-2,633.0	**-100%**
Employees	no.	-	-	59	-	22	1	36	2	120	3,516	-3,396	**-97%**
Accumulated earnings	mil euros	-	-	3.1	0.8	1.6	-5.8	-5.2	4.0	-1.6	937.3	-938.9	**-100%**
Stated capital	mil euros	-	-	41.8	4.2	6.1	1.3	24.9	1.7	80.1	1,972.8	-1,892.8	**-96%**

(74) Beyond what is shown, in some tax jurisdictions the Group is present through entities in pre-operations phase and/or in liquidation and whose overall values are immaterial. For this reason, these countries are not represented in the report. They are: Serbia, Slovakia and Sweden.

North America – Main countries

	UM	USA&Canada	Mexico	2023	2022	2023-2022	%
Taxes Borne	**mil euros**	**89.1**	**3.9**	**93.0**	**84.4**	**8.6**	**10%**
Profit taxes	mil euros	2.2	1.0	**3.3**	**5.5**	**-2.2**	**-40%**
Corporate Income Tax Paid	mil euros	2.2	1.0	**3.3**	**5.5**	**-2.2**	**-40%**
Property taxes	mil euros	69.6	–	**69.6**	**60.0**	**9.6**	**16%**
Taxes on labor	mil euros	15.1	2.8	**17.9**	**18.2**	**-0.3**	**-2%**
Taxes on products and services	mil euros	2.2	–	**2.2**	**0.7**	**1.5**	**228%**
Environmental taxes	mil euros	–	0.0	**0.0**	**0.0**	**-0.0**	**-20%**
Taxes Collected	**mil euros**	**55.9**	**16.7**	**72.7**	**78.2**	**-5.5**	**-7%**
Profit taxes	mil euros	–	–	**–**	**0.0**	**-0.0**	**-100%**
Property taxes	mil euros	–	0.8	**0.8**	**0.8**	**0.0**	**5%**
Taxes on labor	mil euros	55.7	4.8	**60.6**	**64.9**	**-4.3**	**-7%**
Taxes on products and services	mil euros	0.2	11.1	**11.3**	**12.5**	**-1.3**	**-10%**
Environmental taxes	mil euros	–	–	**–**	**–**	**–**	**–**
Total Tax Contribution – TTC (cash basis accounting)	**mil euros**	**145.1**	**20.6**	**165.7**	**162.6**	**3.1**	**2%**
Economic data	**UM**	**USA&Canada**	**Mexico**	**2023**	**2022**	**2023-2022**	**%**
Third party revenues	mil euros	1,948.6	349.6	**2,298.2**	**2,481.9**	**-183.7**	**-7%**
Cross-border intercompany revenues	mil euros	92.5	13.7	**106.2**	**65.4**	**40.8**	**62%**
In-Country intercompany revenues	mil euros	746.6	145.3	**891.9**	**581.3**	**310.5**	**53%**
Earnings Before Taxes	mil euros	-1,573.5	-27.1	**-1,600.6**	**-350.9**	**-1,249.7**	**-356%**
Corporate Income Tax Accrued	mil euros	0.5	12.3	**12.8**	**56.4**	**-43.6**	**-77%**
Prepaid/Deferred Taxes	mil euros	-255.1	-24.8	**-279.9**	**-97.2**	**-183**	**-188%**
Tangible assets	mil euros	11,987.9	831.4	**12,819.2**	**13,687.6**	**-868.3**	**-6%**
Employees	no.	1,440	307	**1,747**	**2,100**	**-353**	**-17%**
Accumulated earnings	mil euros	1,301.8	-565.9	**735.9**	**1,069.7**	**-333.8**	**-31%**
Stated capital	mil euros	26,752.2	2,074.6	**28,826.8**	**24,859.2**	**3,967.6**	**16%**
TT Rate[1]	%	n.a.	n.a.				
TTC in relation to revenues	%	7.1%	5.7%				
Taxes Borne in relation to revenues	%	4.4%	1.1%				
Taxes Collected in relation to revenues	%	2.7%	4.6%				

(1) Due to negative Earnings Before Taxes Borne, the TT Rate has not been calculated.

Latin America – Main countries

	UM	Argentina	Brazil	Chile	Colombia
Taxes Borne	**mil euros**	**23.3**	**831.8**	**349.9**	**561.7**
Profit taxes	mil euros	7.4	186.4	318.1	415.2
Corporate Income Tax Paid	mil euros	5.4	186.4	318.1	391.8
Property taxes	mil euros	0.9	24.9	2.9	1.4
Taxes on labor	mil euros	8.1	57.4	–	16.5
Taxes on products and services	mil euros	5.5	563.0	6.1	97.9
Environmental taxes	mil euros	1.4	0.1	22.8	30.7
Taxes Collected	**mil euros**	**63.0**	**1,511.4**	**131.8**	**81.2**
Profit taxes	mil euros	3.0	16.1	26.6	22.6
Property taxes	mil euros	–	–	–	–
Taxes on labor	mil euros	6.4	43.6	21.4	13.2
Taxes on products and services	mil euros	53.6	1,451.6	83.9	29.3
Environmental taxes	mil euros	–	–	–	16.1
Total Tax Contribution – TTC (cash basis accounting)	**mil euros**	**86.3**	**2,343.2**	**481.7**	**642.9**
Economic data	**UM**	**Argentina**	**Brazil**	**Chile**	**Colombia**
Third party revenues	mil euros	2,399.1	8,854.8	5,192.6	3,387.7
Cross-border intercompany revenues	mil euros	–	66.2	436.7	3.6
In-Country intercompany revenues	mil euros	21.9	710.2	1,571.1	10.2
Earnings Before Taxes	mil euros	140.1	624.6	648.9	797.8
Corporate Income Tax Accrued	mil euros	15.5	170.6	224.8	342.0
Prepaid/Deferred Taxes	mil euros	-9.0	21.8	-6.4	22.9
Tangible assets	mil euros	1,356.4	5,262.3	7,444.0	4,465.8
Employees	no.	3,646	8,145	2,091	2,281
Accumulated earnings	mil euros	280.3	659.0	3,123.4	1,106.9
Stated capital	mil euros	606.3	17,250.6	20,966.1	2,306.1
TT Rate[(1)]	%	14.7%	65.5%	51.4%	58.0%
TTC in relation to revenues	%	3.6%	26.3%	8.6%	19.0%
Taxes Borne in relation to revenues	%	1.0%	9.3%	6.2%	16.6%
Taxes Collected in relation to revenues	%	2.6%	16.9%	2.3%	2.4%

(1) Due to negative Earnings Before Taxes borne, the TT Rate has not been calculated.

Costa Rica	Guatemala	Panama	Peru	2023	2022	2023-2022	%
3.1	**5.3**	**25.8**	**193.9**	**1,994.8**	**1,574.8**	**420.0**	**27%**
1.5	4.8	23.9	168.5	**1,125.8**	**664.8**	**461.0**	**69%**
0.7	4.7	23.9	168.5	**1,099.4**	**638.6**	**460.8**	**72%**
0.2	0.2	0.4	3.5	**34.5**	**40.1**	**-5.6**	**-14%**
0.7	0.3	0.5	2.4	**85.9**	**108.1**	**-22.2**	**-21%**
0.7	–	–	17.4	**690.6**	**693.4**	**-2.9**	**0%**
0.0	0.0	1.0	2.0	**58.0**	**68.3**	**-10.3**	**-15%**
3.6	**4.9**	**3.9**	**90.9**	**1,890.7**	**2,576.5**	**-685.7**	**-27%**
0.0	1.1	3.2	1.5	**74.1**	**66.8**	**7.3**	**11%**
–	–	–	–	**–**	**–**	**–**	**–**
0.2	0.1	0.4	9.8	**95.1**	**100.8**	**-5.6**	**-6%**
3.4	3.8	0.2	79.6	**1,705.3**	**2,395.0**	**-689.7**	**-29%**
–	–	–	–	**16.1**	**13.9**	**2.3**	**0%**
6.7	**10.3**	**29.7**	**284.7**	**3,885.5**	**4,151.3**	**-265.8**	**-6%**

Costa Rica	Guatemala	Panama	Peru	2023	2022	2023-2022	%
18.8	80.5	203.1	1,627.5	**21,764.1**	**25,198.6**	**-3,434.5**	**-14%**
0.5	1.9	0.3	1.6	**510.9**	**811.4**	**-300.5**	**-37%**
5.8	35.3	22.6	226.4	**2,603.5**	**2,849.4**	**-245.8**	**-9%**
-68.9	22.2	36.2	449.8	**2,650.6**	**3,944.7**	**-1,294.0**	**-33%**
0.4	4.6	12.6	156.4	**926.9**	**1,182.9**	**-256.0**	**-22%**
-0.7	–	1.6	7.3	**37.4**	**151.5**	**-114.1**	**-75%**
28.0	321.9	413.4	2,829.1	**22,120.8**	**21,294.1**	**826.7**	**4%**
32	92	92	1,091	**17,470**	**17,360**	**110**	**1%**
-78.7	162.7	148.9	-875.6	**4,526.9**	**3,157.1**	**1,370**	**43%**
322.6	227.8	422.9	3,675.3	**45,777.7**	**43,828.4**	**1,949**	**4%**
n.a.	23.4%	67.7%	40.8%				
34.9%	12.5%	14.6%	17.5%				
16.1%	6.5%	12.7%	11.9%				
18.8%	6.0%	1.9%	5.6%				

Latin America[75] – Minor countries

Economic data	UM	Uruguay	2023	2022	2023-2022	%
Third party revenues	mil euros	0.3	**0.3**	**0.3**	**-0.1**	**-17%**
Cross-border intercompany revenues	mil euros	–	**-**	**-**	**-**	**-**
In-Country intercompany revenues	mil euros	–	**-**	**-**	**-**	**-**
Earnings Before Taxes	mil euros	-0.3	**-0.3**	**-0.2**	**-0.0**	**-21%**
Corporate Income Tax Accrued	mil euros	–	**-**	**-**	**-**	**-**
Prepaid/Deferred Taxes	mil euros	-0.1	**-0.1**	**-0.0**	**-0.1**	**-93,929%**
Corporate Income Tax Paid	mil euros	0.0	**0.0**	**0.2**	**-0.1**	**-93%**
Tangible assets	mil euros	0.0	**0.0**	**0.0**	**-0.0**	**-48%**
Employees	no.	1	**1**	**1**	**-**	**-**
Accumulated earnings	mil euros	0.2	**0.2**	**0.4**	**-0.2**	**-51%**
Stated capital	mil euros	0.0	**0.0**	**0.0**	**-0.0**	**-3%**

(75) Beyond what is shown, in some tax jurisdictions the Group is present through entities in pre-operations phase and/or in liquidation and whose overall values are immaterial. For this reason, these countries are not represented in the report. They are: El Salvador.

Africa and Oceania – Main countries

	UM	South Africa	2023	2022	2023-2022	%
Taxes Borne	**mil euros**	**2.8**	**2.8**	**0.1**	**2.7**	**2,174%**
Profit taxes	mil euros	2.8	**2.8**	**0.1**	**2.7**	**2,174%**
Corporate Income Tax Paid	mil euros	2.8	**2.8**	**0.1**	**2.7**	**2,174%**
Property taxes	mil euros	–	**–**	**–**	**–**	**–**
Taxes on labor	mil euros	–	**–**	**–**	**–**	**–**
Taxes on products and services	mil euros	–	**–**	**–**	**–**	**–**
Environmental taxes	mil euros	–	**–**	**–**	**–**	**–**
Taxes Collected	**mil euros**	**3.9**	**3.9**	**4.4**	**-0.5**	**-11%**
Profit taxes	mil euros	0.4	**0.4**	**0.4**	**0.0**	**13%**
Property taxes	mil euros	–	**–**	**–**	**–**	**–**
Taxes on labor	mil euros	3.5	**3.5**	**4.1**	**-0.5**	**-13%**
Taxes on products and services	mil euros	–	**–**	**–**	**–**	**–**
Environmental taxes	mil euros	–	**–**	**–**	**–**	**–**
Total tax contribution (cash accounting) - TTC	**mil euros**	**6.7**	**6.7**	**4.5**	**2.2**	**49%**
Economic data	**UM**	**South Africa**	**2023**	**2022**	**2023-2022**	**%**
Third party revenues	mil euros	90.0	**90.0**	**120.5**	**-30.4**	**-25%**
Cross-border intercompany revenues	mil euros	0.3	**0.3**	**0.2**	**0.1**	**39%**
In-Country intercompany revenues	mil euros	9.5	**9.5**	**62.5**	**-53.0**	**-85%**
Earnings Before Taxes	mil euros	-4.0	**-4.0**	**-16.9**	**12.9**	**76%**
Corporate Income Tax Accrued	mil euros	1.4	**1.4**	**–**	**1.4**	**–**
Prepaid/Deferred Taxes	mil euros	5.1	**5.1**	**-0.3**	**5.4**	**1,999%**
Tangible assets	mil euros	322.8	**322.8**	**384.3**	**-61.5**	**-16%**
Employees	no.	166	**166**	**182**	**-16**	**-9%**
Accumulated earnings	mil euros	-181.2	**-181.2**	**-166.3**	**-15.0**	**-9%**
Stated capital	mil euros	627	**627**	**689.7**	**-62.7**	**-9%**
TT Rate[1]	%	n.a.				
TTC in relation to revenues	%	7.5%				
Taxes Borne in relation to revenues	%	3.1%				
Taxes Collected in relation to revenues	%	4.3%				

(1) Due to negative Earnings Before Taxes borne, the TT Rate has not been calculated.

Africa and Oceania – Minor countries[76]

Economic data	UM	Australia	Kenya	Morocco	New Zealand	Zambia	2023	2022	2023-2022	%
Third party revenues	mil euros	36.4	–	4.9	3.7	10.9	**55.9**	**60.8**	**-4.9**	**-8%**
Cross-border intercompany revenues	mil euros	0.9	–	–	0.3	–	**1.2**	**1.9**	**-0.7**	**-35%**
In-Country intercompany revenues	mil euros	18.5	–	–	–	0.3	**18.8**	**25.1**	**-6.3**	**-25%**
Earnings Before Taxes	mil euros	-19.2	-0.3	-1.3	0.0	-6.2	**-26.9**	**-27.7**	**0.9**	**3%**
Corporate Income Tax Accrued	mil euros	0.0	–	0.0	–	–	**0.1**	**0.1**	**-0.1**	**-50%**
Prepaid/Deferred Taxes	mil euros	–	–	–	–	-1.7	**-1.7**	**-2.8**	**1.1**	**39%**
Corporate Income Tax Paid	mil euros	0.0	–	–	0.1	–	**0.1**	**0.1**	**-0,0**	**-20%**
Tangible assets	mil euros	12.6	0.0	0.8	0.4	17.3	**31.1**	**362.0**	**-330.8**	**-91%**
Employees	no.	39	1	30	5	5	**80**	**148**	**-68**	**-46%**
Accumulated earnings	mil euros	-3.2	-3.3	0.3	-0.2	-4.7	**-11.2**	**-76.8**	**65.6**	**85%**
Stated capital	mil euros	65.9	2.5	76.6	1.9	7.0	**153.9**	**570.6**	**-416.7**	**-73%**

(76) Beyond what is shown, in some tax jurisdictions the Group is present through entities in pre-operations phase and/or in liquidation and whose overall values are immaterial. For this reason, these countries are not represented in the report. They are: Namibia, Ethiopia and Egypt.

Asia – Main countries

	UM	India	2023	2022	2023-2022	%
Taxes Borne	**mil euros**	**1.4**	**1.4**	**1.8**	**-0.3**	**-19%**
Profit taxes	mil euros	1.0	**1.0**	**1.4**	**-0.5**	**-34%**
Corporate Income Tax Paid	mil euros	0.6	**0.6**	**1.4**	**-0.7**	**-54%**
Property taxes	mil euros	0.0	**0.0**	**0.0**	**0.0**	**81%**
Taxes on labor	mil euros	0.5	**0.5**	**0.3**	**0.1**	**45%**
Taxes on products and services	mil euros	–	**–**	**–**	**–**	**–**
Environmental taxes	mil euros	–	**–**	**–**	**–**	**–**
Taxes Collected	**mil euros**	**6.0**	**6.0**	**5.8**	**0.2**	**4%**
Profit taxes	mil euros	3.3	**3.3**	**3.0**	**0.3**	**11%**
Property taxes	mil euros	–	**–**	**–**	**–**	**–**
Taxes on labor	mil euros	2.1	**2.1**	**1.7**	**0.4**	**23%**
Taxes on products and services	mil euros	0.6	**0.6**	**1.1**	**-0.5**	**-46%**
Environmental taxes	mil euros	–	**–**	**–**	**–**	**–**
Total Tax Contribution – TTC (cash basis accounting)	**mil euros**	**7.4**	**7.4**	**7.5**	**-0.1**	**-1%**
Economic data	**UM**	**India**	**2023**	**2022**	**2023-2022**	**%**
Third party revenues	mil euros	21.1	**21.1**	**42.2**	**-21.0**	**-50%**
Cross-border intercompany revenues	mil euros	12.6	**12.6**	**9.0**	**3.7**	**41%**
In-Country intercompany revenues	mil euros	1.4	**1.4**	**7.0**	**-5.6**	**-80%**
Earnings Before Taxes	mil euros	-10.1	**-10.1**	**-20.7**	**10.7**	**51%**
Corporate Income Tax Accrued	mil euros	0.1	**0.1**	**–**	**0.1**	**–**
Prepaid/Deferred Taxes	mil euros	-0.1	**-0.1**	**1.5**	**-1.5**	**-104%**
Tangible assets	mil euros	65.0	**65.0**	**225.6**	**-160.6**	**-71%**
Employees	no.	371	**371**	**397**	**-26**	**-7%**
Accumulated earnings	mil euros	-35.1	**-35.1**	**-23.3**	**-11.8**	**-51%**
Stated capital	mil euros	190.8	**190.8**	**210.9**	**-20.1**	**-10%**
TT Rate[1]	%	n.a.				
TTC in relation to revenues	%	22.0%				
Taxes Borne in relation to revenues	%	4.2%				
Taxes Collected in relation to revenues	%	17.8%				

(1) Due to negative Earnings Before Taxes Borne, the TT Rate has not been calculated.

Asia – Minor countries[77]

Economic data	UM	China	Indonesia	Israel	Japan	Singapore	South Korea	Taiwan	2023	2022	2023-2022	%
Third party revenues	mil euros	1.4	–	1.5	31.3	-0.0	28.4	3.0	65.6	51.2	14.4	28%
Cross-border intercompany revenues	mil euros	1.2	–	–	0.1	–	0.1	0.1	1.6	0.7	0.9	130%
In-Country intercompany revenues	mil euros	–	–	–	–	–	0.0	–	0.0	0.0	-0.0	-23%
Earnings Before Taxes	mil euros	-2.5	-0.1	0.0	1.3	-1.1	-3.3	-2.5	-8.1	-9.1	0.9	10%
Corporate Income Tax Accrued	mil euros	–	–	0.0	–	-0.0	0.1	–	0.1	-0.0	0.1	970%
Prepaid/Deferred Taxes	mil euros	–	–	–	-1.1	–	–	–	-1.1	–	-1.1	–
Corporate Income Tax Paid	mil euros	–	–	–	0.0	–	0.1	–	0.1	0.0	0.1	231%
Tangible assets	mil euros	0.1	–	0.1	2.0	–	9.5	3.1	14.9	10.0	4.8	48%
Employees	no.	12	–	1	32	–	43	11.0	99	89	10	11%
Accumulated earnings	mil euros	-6.4	-3.0	–	1.3	-6.4	-24.5	-3.0	-41.9	-38.7	-3.2	-8%
Stated capital	mil euros	9.1	3.6	–	2.0	5.5	36.4	7.2	63.7	52.9	10.9	21%

(77) Beyond what is shown, in some tax jurisdictions the Group is present through entities in pre-operations phase and/or in liquidation and whose overall values are immaterial. For this reason, these countries are not represented in the report. They are: Saudi Arabia, Lebanon and Vietnam.

Reconciliations with the 2023 Integrated Annual Report

In the following paragraphs, a reconciliation of data represented in the Tax Transparency Report is made with respect to the contents of the 2023 Integrated Annual Report. This reconciliation is necessary given the different methods for drafting the Tax Transparency Report – which have been changed by the OECD rules for Country-by-Country Reporting – with respect to the principles adopted for the drafting of the Consolidated Financial Statements.

	2023		
mil euros			
Items subject to reconciliation	**Tax Transparency Report**	**Integrated Annual Report**	**Difference to be reconciled**
Third party revenues	112,089	95,565	-16,524
Earnings Before Taxes	7,306	7,416	110
Tangible assets	92,756	89,801	-2,955
Taxes paid	2,707	2,958	251

Third party revenues

The deviations between the data given in the Tax Transparency Report and the data in the 2023 Integrated Annual Report are:

i. **Financial income (-6,166 million euros)**: for the purposes of the Integrated Annual Report the financial data for financial income is entered in the financial statements on a specific line of the Income Statement that is different than the "Revenues" item, which differs from what is required under the OECD rules[78] applied for the purposes of the Tax Transparency Report;

ii. **Derivatives (-5,552 million euros)**: for the purposes of the Integrated Annual Report, the management of derivative instruments is centralized within the trading companies that operate on behalf of the Group companies in generation and marketing. Intercompany transactions linked to this operation are eliminated for the purposes of drafting the Financial Report but not for the purposes of the Tax Transparency Report;

iii. **System charges (-2,547 million euros)**: the system charges that the Italian marketing companies re-invoice to end customers, and which consist of the amount that was charged to them by the distribution companies, are the subject of a finalized consolidation adjustment to align mutual balances between companies belonging to the same group. Therefore, intercompany economic effects (*i.e.*, revenues) are eliminated for the purposes of the Financial Report but not for the purposes of the Tax Transparency Report;

iv. **Revenue from Discontinued Operations[79] (-2,539 million euros)**: for the purposes of the Integrated Annual Report, the revenues relating to Group components (branches, companies or geographical areas) that have been or are being disposed of are shown as a single net amount in a separate line of the Income Statement, while for the purposes of the Tax Transparency Report these revenues are analytically represented by the companies within the scope;

v. **Fair value of companies consolidated using the equity method (239 million euros)**: for the purposes of the Integrated Annual Report, the proceeds deriving from remeasurements at fair value of companies valued using the equity method are included in the results for the period through consolidation entries. Vice versa, for the purposes of the Tax Transparency Report, the proceeds related to the companies consolidated using the equity method are excluded as these entities are not relevant;

vi. **Dividends from companies consolidated using the equity method (-26 million euros)**: for purposes of the Integrated Annual Report, dividends received from consolidated companies[80] are eliminated. These revenues are considered in the Tax Transparency Report;

vii. **Other consolidation adjustments** made on the basis of the application of international accounting principles **(67 million euros)**[81].

(78) For the purposes of Country-by-Country Reporting (BEPS Project – Action 13).
(79) For more details regarding the definition of Discontinued Operations, refer to the Integrated Annual Report.
(80) Using the full, proportional and equity method.
(81) These include the following specific situations listed by way of example only: (i) elimination of intercompany margins and gains, (ii) recognition of any negative goodwill following M&A transactions (iii) capitalizations of financial expenses in cases of equity injection, (iv) adjustments to contracts with physical delivery stated at fair value and (v) changes in the consolidation scope during the year.

	2023
Third party revenues – Tax Transparency Report	**112,089**
Financial income	**-6,166**
Derivatives	**-5,552**
System charges	**-2,547**
Revenues from discontinued operations	**-2,539**
Fair value of companies consolidated using the equity method	**239**
Dividends from companies consolidated using the equity method	**-26**
Other consolidation adjustments	**67**
Revenues – Consolidated Financial Statements	**95,565**

Earnings Before Taxes

The deviations between the data given in the Tax Transparency Report and the data in the 2023 Integrated Annual Report are:

i. **Impairment on shareholdings (1,169 million euros)**: the accounting records for equity investments consolidated with the full method does not have an impact on the Income Statement in the Annual Financial Report. These accounting records however involve a reduction in profit before taxes for the purposes of the Tax Transparency Report;

ii. **Derivative management (-707 million euros)**: for the purpose of the Integrated Annual Report, the accounting records related to the Cash Flow Hedge reserve for a possibly different qualification of the derivatives between the stand alone view of the Company and that of the Group do not have any impact on the Income Statement. These accounting records however involve an increase in profit before taxes for the purposes of the Tax Transparency Report;

iii. **Results from Discontinued Operations (-301 million euros)**: for the purposes of the Integrated Annual Report, the results related to Group components (branches, companies or geographical areas) that have been or are being discontinued are stated as a single net amount on a separate line of the Income Statement, whereas for the purposes of the Tax Transparency Report these revenues are represented analytically among those of the companies within the scope;

iv. **Results from companies valued at equity (-42 million euros)**: for the purposes of the Integrated Annual Report, the results from companies consolidated at equity are included. Otherwise, these results are not considered in the Tax Transparency Report;

v. **Other consolidation adjustments** made on the basis of the application of international accounting principles **(-9 million euros)**[82].

Tangible assets

The differences between the data given in the Tax Transparency Report and the data in the Integrated Annual Report are due to **Adjustments from consolidation (2,955 million euros)**[83].

	2023
Tangible assets – Tax Transparency Report	**92,756**
Adjustments from consolidation	**-2,955**
Consolidated tangible assets	**89,801**

(82) These include the following specific situations listed by way of example only: (i) adjustments for adaptation of value following impairment tests and consequent adjustments of depreciation and amortization, (ii) elimination of gains from intercompany sales of assets and consequent adjustments of depreciation and amortization, (iii) changes during the year in the scope of consolidation, (iv) provision (or release) of funds in the Income Statement, and (v) intercompany capital losses (capital gains).

(83) Adjustments due to the effects of (i) Purchase Price Allocations made during acquisition of controlling interests in companies, (ii) impairment of cash generating units, (iii) capitalizations of financial expenses of fixed assets realized internally, (iv) elimination of any gains during the sale of intercompany assets and (v) elimination of effects related to Discontinued Operations and assets qualified as Available for Sale.

	2023
Earnings Before Taxes - Tax Transparency Report	**7,306**
Impairment losses on shareholdings	**1,169**
Derivative management	**-707**
Results from discontinued operations	**-301**
Results from companies accounted for using the equity method	**-42**
Other consolidation adjustments	**-9**
Earnings Before Taxes - Consolidated Annual Report	**7,416**

Income taxes paid

The data of Income taxes paid for the purposes of the Integrated Annual Report is determined through the method of indirect recognition, provided for under international accounting principle IAS 7.
Contrarily, the Tax Transparency Report recognizes the data for Income Taxes paid on the basis of information collected from the individual companies in the different tax jurisdictions, consistent with the rules laid down by the OSCE for Country-by-Country Reporting.
The deviation is due to the different methods of recognizing the data and to the principles to which they refer(84).

	2023
Taxes paid - Tax Transparency Report	**2,707**
Differences due to the use of the indirect method for the purposes of the cash flow statement	**251**
Taxes paid - Consolidated Annual Report	**2,958**

Tax Rate

With reference to the reconciliation between the theoretical and actual tax rate, reference should be made to the analysis contained in the 2023 Integrated Annual Report.

(84) By way of example only, the differences in 2023 can mainly be attributed tot: (i) inclusion in the data of the Integrated Annual Report of the taxes related to dividends (excluded from the data in the Tax Transparency Report) and (ii) changes during the year in the scope of consolidation.