

Total Tax Contribution 2018



June 2019



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An aerial view of a modern building's atrium. The space is characterized by a grid of white lines on a light-colored floor, creating a series of rectangular and square zones. Numerous people are seen walking through the space. The building's facade is composed of white panels and large windows. In the upper left, there are outdoor seating areas with green and white striped awnings. A prominent white column with a golden top is visible near the top center. A large red rectangular overlay covers the left side of the image, featuring the text "1. Executive Summary" in a white, italicized serif font.

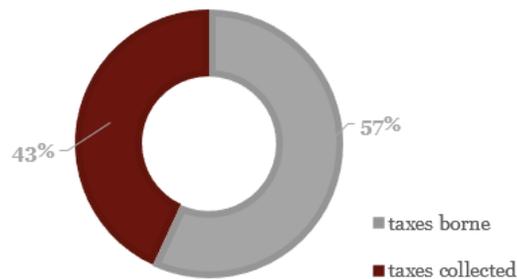
1. Executive Summary

1. Executive Summary

Enel's total tax contribution in 2018 amounted to **Soles 823 million**, with 57% of this total corresponding to taxes borne and 43% to taxes collected.

Total Tax Contribution in 2018

TTC - 823 MM PEN



Source: PwC

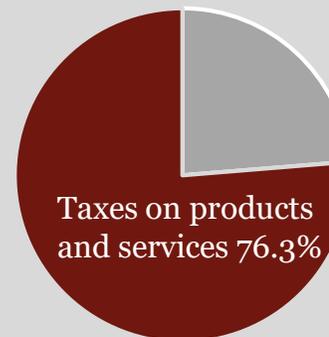
Taxes borne in 2018



Source: PwC

Taxes borne by Enel in 2018 amounted to **Soles 472 million**. A major part of this total corresponds to **profit taxes**, which account for 77% of taxes borne.

Taxes Collected in 2018

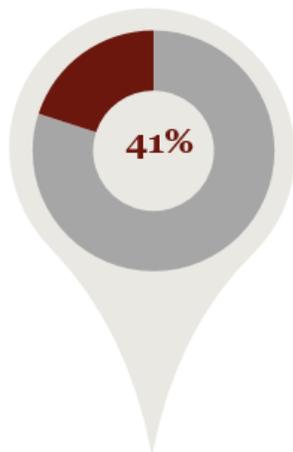


Source: PwC

Taxes collected by Enel in 2018 amounted to **Soles 351 million**. A major part of this total corresponds to **Taxes on products and services**, which account for 76% of taxes collected.

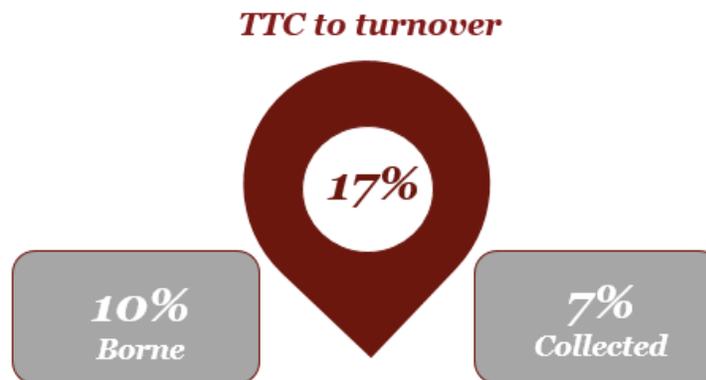
1. Executive Summary

Distributed Tax Value* in 2018



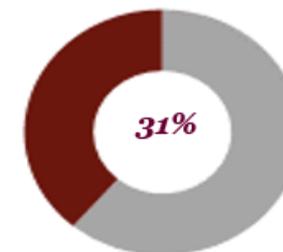
Source: PwC

Tax Contribution of Enel with respect to turnover in 2018



Source: PwC

Total Tax Contribution Rate in 2018



Source: PwC

Enel's **Total Tax Contribution rate** for 2018 is **31%**. In other words, taxes borne account for 31% of total income before all taxes borne for the purposes of the Total Tax Contribution.

41% of the value generated by Enel has been paid in to the Public Treasury in the form of taxes borne and taxes collected. Of **every 100 Soles generated** by Enel in 2018, **Soles 41 were therefore used in the payment of taxes.**

**Concept is explained on slide 24 .*

In relation to the size of its business, for every Soles 100 of net revenues obtained by the Company, **Soles 17 are used in the payment of taxes.** Of this amount, Soles 10 correspond to taxes borne and Soles 7 to taxes collected.

1. Executive Summary

Trend in TTC 2017-2018



Source: PwC

In 2018, Enel's **Tax Contribution** in Peru has increased by **3%** with respect to 2017.

This trend is attributable, to a **6% decrease in taxes borne** in relation to the previous year and a big **increase, of 19% in taxes collected.**

Wages and Taxes per employee in 2018 vs 2017



S/ 207,477

Wages per employee



S/ 39,178

Taxes per employee

Source: PwC

In 2018, annual Wages per employee and taxes per employee amounted to **Soles 207,477** and **Soles 39,178** respectively.

Compared to 2017, the annual wages per employee has increased by **6%**.

A photograph of a modern building with a curved facade. The upper part of the building is made of light-colored stone tiles, and the lower part is a glass curtain wall. The building is set against a clear sky. A dark red rectangular overlay is positioned on the left side of the image, containing white text.

2. Background and the purpose of this report

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Purpose and scope of the report

The PwC global network through its different studies is eager to create, maintain, and strengthen links between companies and governments as well as between companies and society. While the actions of companies, regardless of their industry sector, are increasingly put under scrutiny, it is essential to facilitate the dialogue between different stakeholders, promote strong values and principles and innovate by sharing analyses and ideas.

The aim of this report is to obtain and analyse the Total Tax Contribution data of Group Enel Peru (hereinafter Enel of the Company) for 2018. The Group includes the following companies: Enel Generación Perú S.A.A., Enel Perú S.A.C., Enel Distribución Perú S.A.A., Enel Generación Piura S.A.A., Chinango S.A.C., Enel Green Power Perú S.A., Energética Monzón S.A.C., Proyectos y Soluciones Renovables S.A.C. and Compañía Eléctrica Veracruz S.A.C.¹

The data for 2018, and the analyses of contribution profiles and certain indicators have been compared with the equivalent data for 2017, and a study made of the trend reflected.

The contribution made by major sectors of activity to the public purse in the jurisdictions in which they are present, and the way in which their tax contribution is distributed, are currently central topics of socio-economic debate.

In this context, regarding the tax strategy of Enel which is declared to public and shared in the official website of the company, compliance with the tax legislations in which Enel operates carries an utmost importance for the company.

Fully aware of the fact that the tax revenue is one of the main contributors of the economic and social development in the regions in which the Group operates, Enel gives great importance to tax reporting and transparency.

Enel has decided to publish this Total Tax Contribution Report to show the importance the Company attaches to tax matters and the extent of its commitment to its main stakeholders. Information available in this report renders it possible to identify measure and communicate the business asset, which is Enel's tax contribution, so that it can have a significant impact on its reputational value. The purpose of this report is to enlarge the concept of Corporate Social Responsibility and to reveal the value of the social function deriving from Enel's tax contribution.

The way in which the tax information is provided in this report intends to make it more versatile and facilitate its integration so that it can be presented in accordance with the different parameters required by different stakeholders.

¹ Enel Green Power Perú S.A., Energética Monzón S.A.C., Proyectos y Soluciones Renovables S.A.C. are renewable companies which have a functional currency in united states dollars. Their financial statements in soles are being used for this purposes, as the local legislation requires that the accounting books must be registered in soles.

“The Enel Group, in the spirit of its sustainability strategy, manages its tax-related activities in accordance with values of honesty and integrity.”

2. Background and the purpose of this report

The data compiled by PwC includes information received from Enel obtained from its own IT system and its internal working procedures. Our work has consisted of the analysis of the information supplied by Enel and verification of the consistency of the trends and figures reflected. Their origin has been neither verified nor audited.

In relation to the above, this report is based on the tax contribution figures provided as at 8th of March 2019. Our fieldwork was concluded on 8th of March 2019, and there could be significant events that have taken place since this date, which would not be reflected in this report.



TTC Methodology

The Total Tax Contribution (hereinafter TTC) methodology measures the total impact of the payment of taxes by a company. This valuation takes into account the total contribution of taxes paid to different Administrations, either directly or indirectly, as a result of Enel's economic activity.

The key points to be borne in mind in relation to this methodology are:

1. It distinguishes between those taxes that constitute a cost for Enel and those taxes that it collects.

Taxes borne are the taxes that Enel has paid to the Peruvian Administrations of the different jurisdictions in which it operates. These are taxes that represent an actual cost for the Company, e.g. certain environmental taxes.

Taxes collected are those that have been paid in because of Enel's economic activity but which, apart from the related management expenses, imply no cost for the Company.

These are nevertheless amounts which are paid into the public purse as a result of Enel's economic activity and should therefore be taken into consideration when analysing its tax contribution. Taxes withheld on the earned income paid to workers are one example of what we refer to as a tax collected. They constitute tax revenues obtained by the Administration thanks to the economic value generated by Enel.

2. Background and the purpose of this report

In this respect, the TTC methodology is consistent with the approach adopted by the OECD, which highlights the relevance of the role played by business groups in the taxation system, both as contributors of taxes which imply a cost ("Legal Tax Liability"), and as "collectors" of taxes on behalf of others ("Legal Remittance Responsibility"), as reflected in working paper no. 32. "Legal tax liability, remittance responsibility and tax incidence".²

2. Since taxes are known by different names in different countries, taxes borne and taxes collected have been grouped into 5 main categories:



(i) Profit taxes:

This includes taxes borne on the income obtained by companies, such as corporate income tax, the tax on economic activities and taxes collected in the form of withholdings on payments made to third parties.



(ii) Property Taxes:

These are taxes levied on the ownership, sale, transfer or tenancy of property.



(iii) Employment Taxes:

Taxes linked to employment comprise both taxes borne and those collected, including personal income tax withholdings on payments to employees and the social contributions payable by both the employee and the company.



(iv) Taxes on products and services:

There are indirect taxes levied on the production and consumption of goods and services, including VAT, customs, duties, etc.



(v) Environmental taxes:

Taxes levied on the supply, use or consumption of products and services which are considered to have an environmental impact.

The classing of taxes as environmental is based on the definition agreed upon for the purposes of the harmonized statistical framework developed jointly, in 1997, by Eurostat, the European Commission, the Organization for Economic Cooperation and Development (OECD), and the international Energy Agency (IEA), according to which environmental taxes "*are taxes whose base is a physical unit (or a proxy of a physical unit) of something that as a proven, specific, negative impact on the environment. All taxes on energy and transport are included and all value-added-type taxes are excluded*".³

3. It includes all tax payments made to Public Administrations.

When considering the figures reflected in this report, it should be borne in mind that they include tax payments made to public Administrations in respect of items which, given historic or circumstantial reasons, they are not classes as such.

² <http://www.oecd-ilibrary.org/docserver/download/e7ced3ea-en.pdf?expires=1518608619&id=id&accname=guest&checksum=F8B98F3CB2D74B6C44A7DB049DF7A63B>

³ <https://stats.oecd.org/glossary/detail.asp?ID=6437>

2. Background and the purpose of this report

4. It can be tailored to the specific circumstances of the organisation.

In relation to the composition of Group Enel Peru and the calculation of its overall TTC, it should be borne in mind that:

This report takes into account 100% of the tax contribution made by all Peruvian Enel companies.

In relation to the overall amount of payments to the Administration taken into consideration for the purposes of this study, a list of all Peruvian taxes covered by this analysis is attached hereto illustration purposes in the form of an appendix.

5. The special characteristics of Value Added Tax and equivalent taxes are taken into account.

Value Added Tax (and equivalent taxes) are classed as a tax on products and services collected, and its amount reflects the net payments made by Enel to the tax authorities of each of the jurisdictions in which it operates in the corresponding period.

In view of the way in which VAT works, the figure presented in this respect for a particular country includes the positive amount paid in to the corresponding Treasury, arrived at by subtracting VAT deducted from VAT accrued.

If in the overall calculation for the year for a particular country, the net figure arrived at by subtracting VAT deducted from VAT accrued is negative, owing to a refund, no figure is shown.

On the other hand, amounts of VAT which are not recoverable because the continuation of the value chain through the charging of output tax is not possible, are regarded as a tax on products and services borne, since they represent a cost for the company.

2. Background and the purpose of this report

6. Main Assumptions made during the preparation of this report

(i) Perimeter: This report takes into account 100% of the tax contribution made by companies whose accounts are consolidated with those of the parent company by the full consolidation method or other Peruvian companies in which Enel has a significant presence, provided that it has been possible to obtain the necessary information. In particular, this report considers the tax contributions made by 9 entities in 2017 and 9 entities in 2018.

(ii) Currency: This report considers Soles as the currency to be referred.

(iii) Certain Economic Indicators

1) Revenues: Considering that consolidated financial statements are not prepared at the level of Peru, the respective amount is reported as the sum of revenue of each entity in scope.

2) Wages and salaries: Considering that consolidated financial statements are not prepared at the level of Peru, the respective amount is reported as the sum of wages and salaries of each entity in scope. (excluding social security contributions, incentives or benefits).

3) Profit before Taxes: Report considers data on profit before taxes which is provided as “EBT/ earnings before tax” in the local reporting.

Considering that consolidated financial statements are not prepared at the level of Peru, the respective amount is reported as the sum of profit before taxes of each entity in scope.

The amount of profit before tax excludes intercompany dividends in order to avoid double-counting of the same income of various entities, if that income was distributed as dividends to Peruvian entities. Such calculation allows to reflect the objective amount of Profit before taxes at the country level, and to calculate the objective ETR since dividends are usually subject to beneficial tax treatment compared to the other types of income (so-called ‘participation exemption’ regime).

An aerial photograph of a large, paved public square. The square is divided into sections by wide, light-colored stone tiles. A prominent feature is a wide, curved set of stone steps that runs diagonally across the frame. Several people are scattered throughout the square, some walking, some standing in small groups, and one person pushing a stroller. In the lower-left area, a small dog is visible. Two people are riding bicycles in the lower-right section. A tall, green lamppost stands near the curved steps. The overall scene is bright and open, suggesting a public gathering space.

3. TTC of Enel Peru in 2018

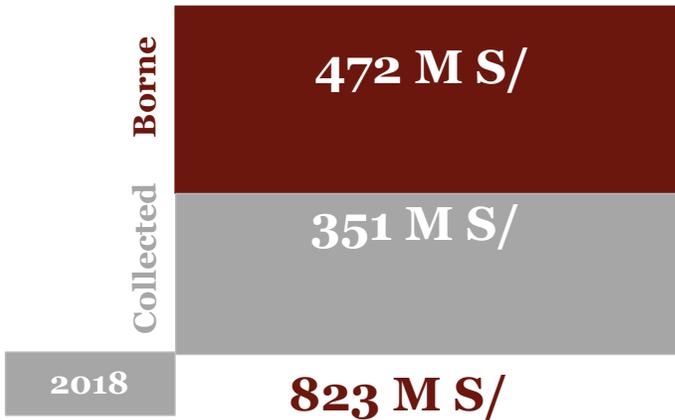
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TTC of Enel Group in 2018 2018 Country Report																																																																																																											
Country	Peru	31/12/2018																																																																																																									
Economic data Amount (local currency)																																																																																																											
Revenues		4,926,385,809																																																																																																									
Wages and salaries		195,443,000																																																																																																									
Average number of employees		942																																																																																																									
Income before tax		1,406,702,846																																																																																																									
Income before tax borne		1,513,366,956																																																																																																									
Total taxes borne		472,388,589																																																																																																									
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TTC in relation to revenues		17%																																																																																																									
Taxes borne in relation to revenues		10%																																																																																																									
Taxes collected in relation to revenues		7%																																																																																																									
Tax value distributed to society		41%																																																																																																									
Wages and salaries per employee		207,477																																																																																																									
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Total taxes borne / Income before taxes borne
 Total Tax Contribution / Revenue
 Taxes borne / Revenue
 Taxes collected / Revenue
 Tax borne and collected / Total value distributed (regarded as the sum of: income after tax or shareholder value, wages and salaries, net interest, taxes borne and taxes collected)
 Wages and salaries / Number of employees
 Total taxes linked to employment (borne and collected) / Average number of employees

3. TTC of Enel Peru in 2018

Analysis of the total tax contribution in 2018



Enel's Total Tax Contribution in Peru amounted to Soles **823 million in 2018**.

Of this, **57%** corresponds to **taxes borne** which represent a cost for the Company and the remaining **43%** corresponds to taxes collected by the Group owing to the pursuit of its economic activity.

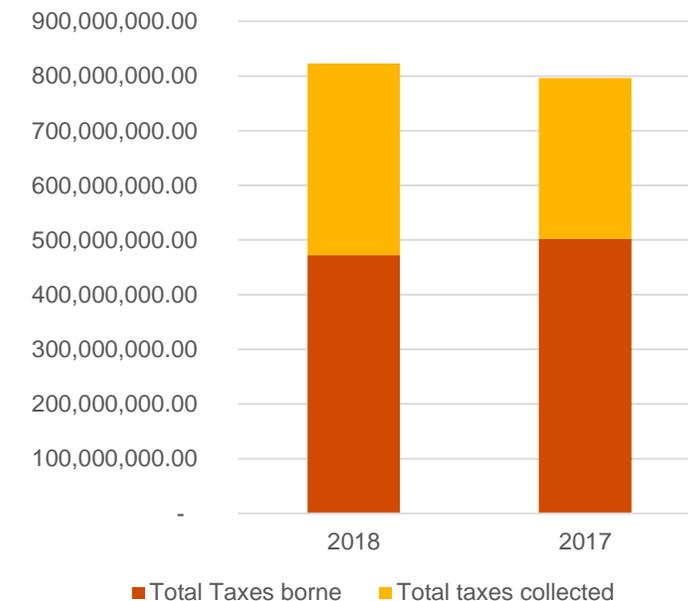
Source: PwC

Trend in total tax contribution

The amounts taken into account for the purpose of analysing the trend in Total Tax Contribution over the years 2017 and 2018 include taxes borne and collected by all Peruvian Enel Companies.

Even though in 2018 there was a decrease of **Soles 30 million** in taxes borne by Enel, mainly explained by a decrease of profit taxes borne by Enel as in 2017 there was a regularization of income tax of 2016 and in 2018 there was a tax balance in favour of Enel; taxes collected in 2018 increased in approximately **Soles 57 million**. This is due mainly to the: (i) increase of taxes on products and services, as billing in tolls, energy and power raised, and (ii) profit taxes, which increased in **139%** from 2017, mainly by the increase of withholdings on dividends in 2018.

Chart 1. Evolution of Enel's Total Tax Contribution



Source: PwC

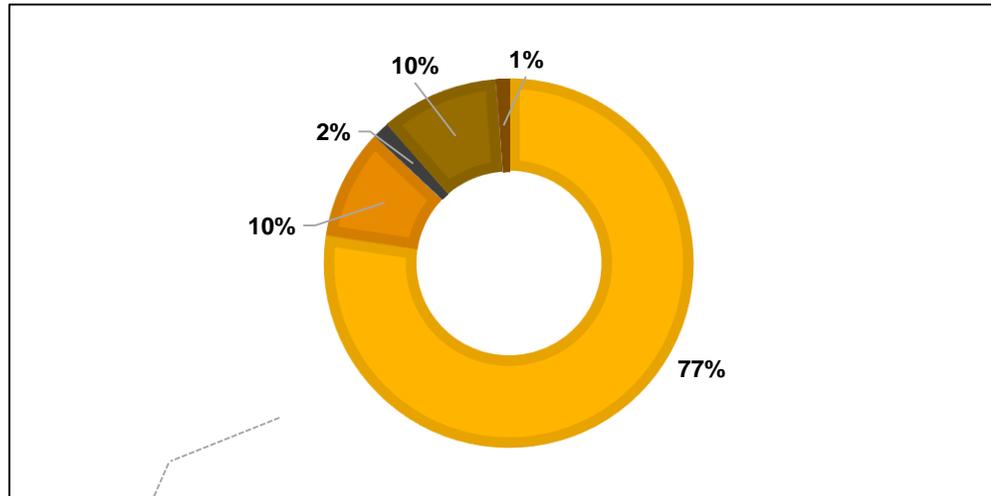
3. TTC of Enel Peru in 2018

Analysis of taxes borne in 2018

Profile of taxes borne

As has been indicated above, taxes borne by Enel in 2018 amounted to **Soles 472 million**.

Chart 2: Types of taxes borne by Enel in 2018



Profit taxes	365,724,479
Property Taxes	45,747,829
Employment Taxes	7,161,036
Taxes on products and s	48,188,820
Environmental Taxes	5,566,425
Total	472,388,589

Source: PwC



It is **profit taxes** that feature most prominently, amounting to **Soles 366 million** and accounting for **77% of total taxes borne**.

Profit Taxes includes most notably the payments made to the tax Authority in respect of Corporate Income Tax.



Employment Taxes account for **2%** of Enel's total tax contribution insofar as relates to taxes borne during the year. This amount comprises contributions amounting to **Soles 7 million** paid to the Social Security authorities (or similar bodies) and other type of taxes.



Property taxes, which include primarily Temporary Tax on Net Assets, Tax on Real Property and Municipal fees, **account for 10%** of total tax payments made by the Company corresponding to taxes borne and amount to **Soles 46 million**.



This is followed by **Taxes on products and services**, which consist of the regulation contributions to public entities.

In the case of **taxes on products and services**, they amount to **Soles 48 million**, accounting for **10% of total taxes borne**.



On the other hand, **environmental taxes**, which includes the primarily the right of use of water tax, **account for 1%** of total tax payments made by the Company corresponding to taxes borne and amount to **Soles 6 million**.

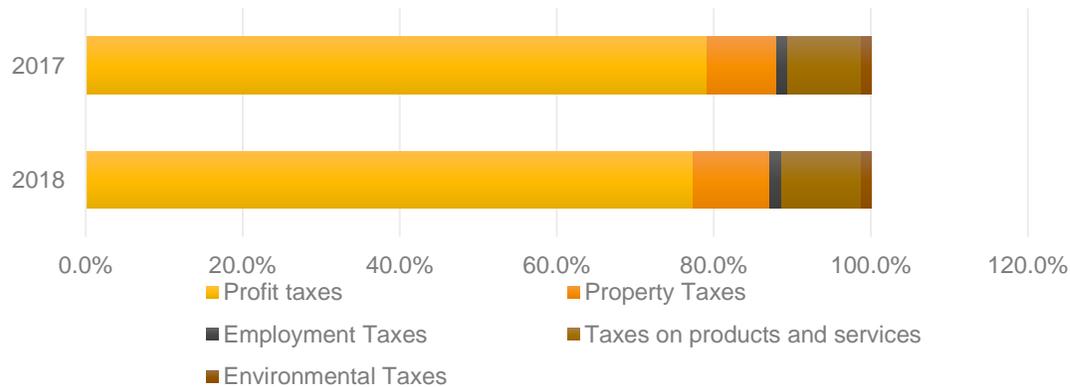
3. TTC of Enel Peru in 2018

Analysis of taxes borne in 2018

Trend in taxes borne

Taxes borne reflect a **downward trend** over the past year, having decreased by approximately **Soles 30 million**, which represents a decrease in relative terms of **6%** in 2018 in relation to 2017.

Chart 3: Evolution of taxes borne by Enel



Source: PwC



More specifically, the main factor that gives rise to the decrease in contribution in absolute terms coincides with the decrease in the **profit taxes**, which has decreased by approximately **Soles 31 million**, signifying a decrease of **8%** in relation to 2017.



The above-mentioned corresponds to the fact that in 2017, Enel had to pay taxes due to the regularization of 2016 income tax, while in 2018 Enel did not face a similar situation. Indeed, in 2018 Enel had a positive balance to be applied against 2017 income tax.

Employment taxes increased in **0.3%** in relation to 2017.



Meanwhile, **Property taxes** have increased by **2%** in relation to 2017. The variation in Property taxes occurs mainly due to the increase in the tariff values of land and construction unit prices approved in a yearly basis. In addition, it must be taken into account that properties of the renewable companies were incorporated to the tax basis.



Taxes on products and services have increased by approximately 2%. This responds to fact that in 2018 the renewable companies began their activities. Therefore, they invoiced energy supply, which was included in the tax basis of Regulation contributions to public entities. Likewise, the other companies contributed more for their higher billing for power and electric power, as they have regulated prices.



Environmental taxes have decreased in **5%**. However, this represented only a difference of 263,632 Soles.

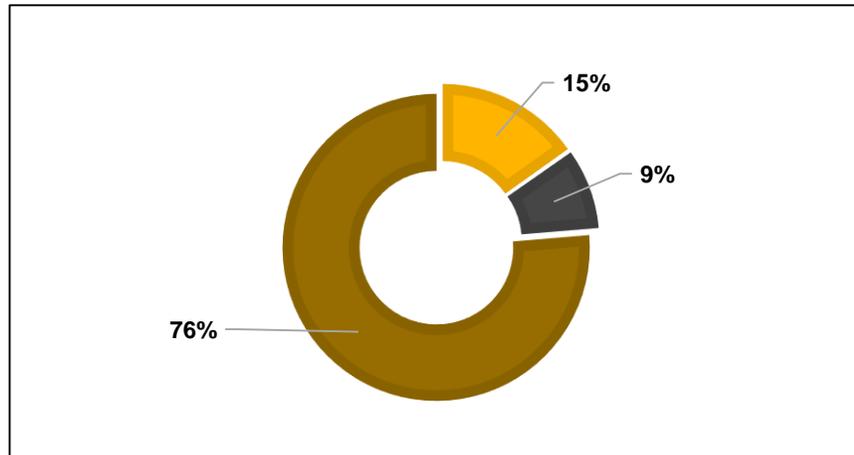
3. TTC of Enel Peru in 2018

Analysis of taxes collected in 2018

Profile of taxes collected

Taxes collected in the year amounted to a total of **Soles 351 million**, their profile being as shown below:

Chart 4: Types of taxes collected by Enel in 2018



Profit taxes	53,307,198
Property Taxes	-
Employment Taxes	29,744,557
Taxes on products and services	268,020,812
Environmental Taxes	-
Total	351,072,567



As can be seen from the above chart, the most important of the taxes collected by the Company during 2018 are the **taxes on products and services**, which account for **76%** of total taxes collected, amounting to **Soles 268 million**.

This amount corresponds in its entirety to value added tax.



Taxes on products and services are followed by **profit taxes**, accounting for **15%** of the total taxes collected and amounting to **Soles 53 million**. Profit taxes correspond to withholding on payments to non-residents without permanent establishments, revenues from investment capital and withholdings to services rendered by independent individuals.



Employment taxes, account for **9%** of total taxes collected in 2018. Employment taxes include most notably withholding on the employee's earned income, amounting to **Soles 30 million** for the year.

Source: PwC

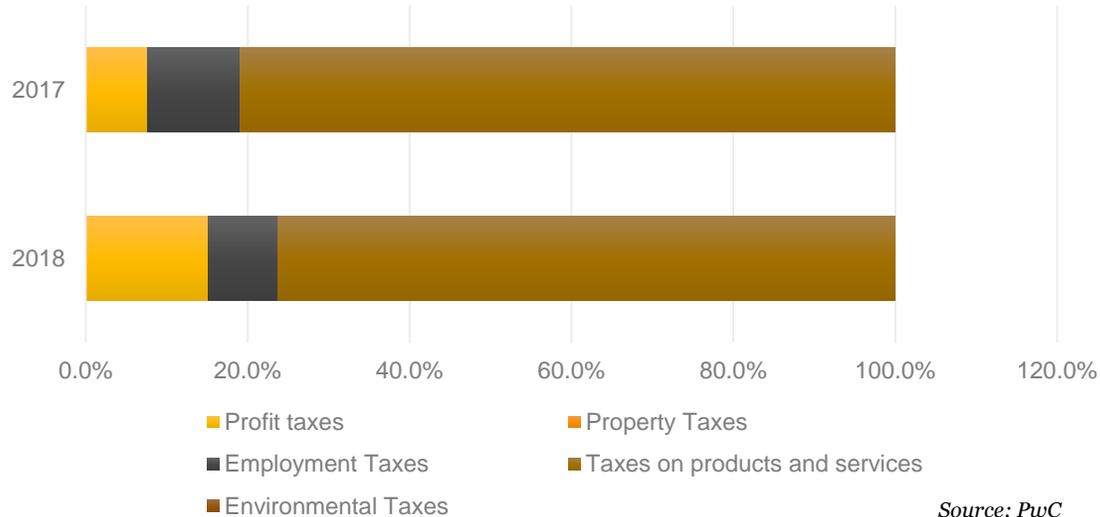
3. TTC of Enel Peru in 2018

Analysis of taxes collected in 2018

Trend in taxes collected

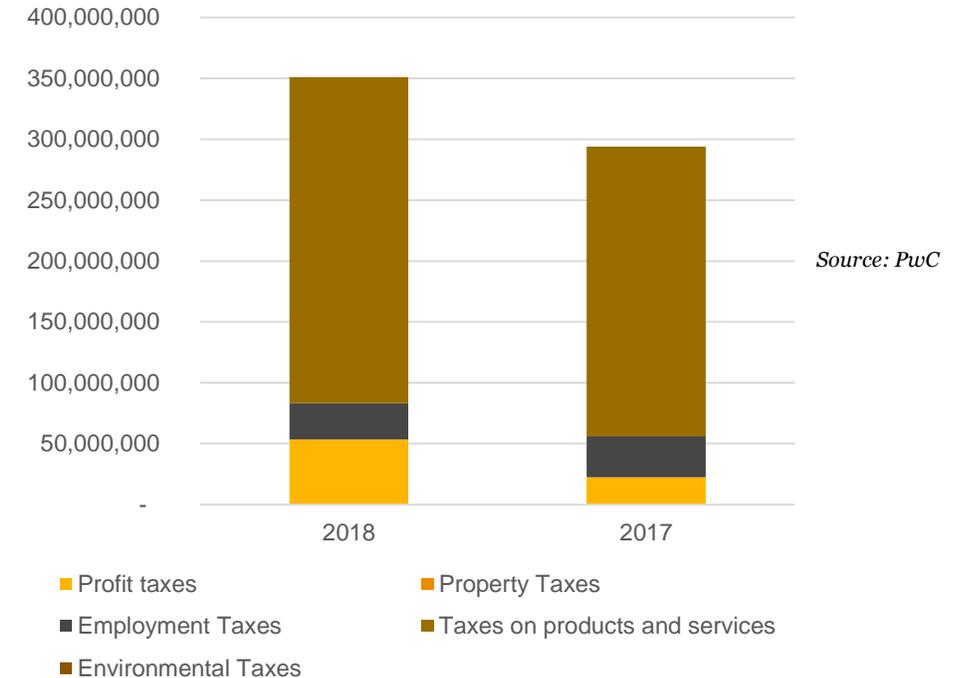
Taxes collected during 2018 **increased** in absolute terms by approximately **Soles 57 million**. This represents an increase, of **19%**, with respect to 2017.

Chart 5: Evolution of the profile of taxes collected by Enel



Profit taxes have **increased by 139%** with respect to the previous year, which amounts to **Soles 31 million**. The variation mainly due to the fact that in the year 2018 taxes on dividends amounted to **Soles 32 million**, compared to 2017, in which they amounted to Soles 12 million. The other difference of Soles 11 million, is explained by an increase on withholdings on payments to non-residents (without PE).

Chart 6: Evolution of taxes collected by Enel



This chart shows how the weighting of each group of taxes collected has increased over the years 2017 and 2018.

On the other hand, **taxes on products and services** have also increased in **13%**, which amounts to **Soles 30 million**. This is mainly due to two factors, (i) higher billing in tolls and use of transmission facilities, and (ii) higher billing for regulated power and electric power.

Employment taxes decreased in **12%** which amounts to **Soles 4 million**, from 2017 to 2018, this was mainly due to a voluntary retirement incentive plan that was executed in 2017.

3. TTC of Enel Peru in 2018*

TTC Indicators

Total Tax and Contribution Rate (1/2)

	TTCR of Enel Peru
2017	39%
2018	31%

The total tax and contribution rate (TTCR) indicator is equal to the sum of all the taxes and mandatory social contribution paid expressed as percentage of company's commercial profit**. TTCR indicator is calculated as the percentage of taxes borne with respect to profit before such taxes, based on the aggregated figures for Enel's activity in Peru.

This is the indicator used in the **Paying taxes study** published annually by the World Bank and PwC in order to measure the competitiveness of the tax systems of 189 countries. Paying taxes 2019 is based on a case study company to facilitate a global like-for-like comparison.

The calculation of TTCR in Paying Taxes is influenced by the limitation of case study. The case study considers a local medium enterprise in 2nd year of operation, domestically owned, which does not participate in foreign trade and does not have domestic or foreign subsidiaries. Thus, due to the limitation of the case study, certain tax measures such as Industry 4.0 incentives, Patent box, cross border issues are not reflected in the TTCR according to Paying Taxes study, differently from ENEL.

* Due to the lack of information about TTCR in Peru in 2018 (which will be reflected in the Paying Taxes report for 2020 that will be published in the end of 2019), the comparison of 2017 Enel rate has been performed with the benchmark. The data on Peruvian companies with respect to 2017 are contained in the Paying Taxes study for 2019 – the latest one available at the time of preparation of this report.

** Commercial profit is essentially net profit before all taxes borne. It differs from the conventional PBT, reported in financial statements. In computing PBT, many of the taxes borne by a company are deductible. Commercial profit is calculated as sales minus cost of goods sold, minus gross salaries, minus administrative expenses, minus other expenses, minus provisions, plus capital gains (from the property sale), minus interest expense, plus interest income and minus commercial depreciation.

Source: <https://www.pwc.com/gx/en/services/tax/publications/paying-taxes-2019/overall-ranking-and-data-tables.html>

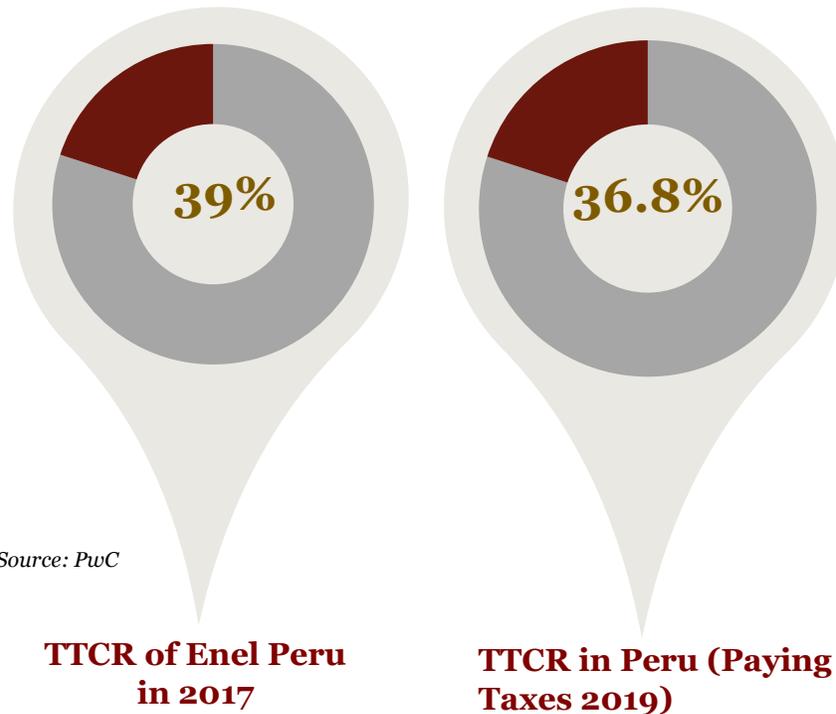
Taxes borne representing a direct cost for Enel accounted for 39% of profit before all taxes borne in 2017 and 31% in 2018.

3. TTC of Enel Peru in 2018

TTC Indicators

Total Tax and Contribution Rate 2/2

According to the results of the 2019 Paying Taxes report, the TTCR indicator for Peru in 2017 is **36.8%**.



Source: PwC

TTCR of Enel Peru in 2017 has been generally in line with the industry average reported in Paying Taxes report.

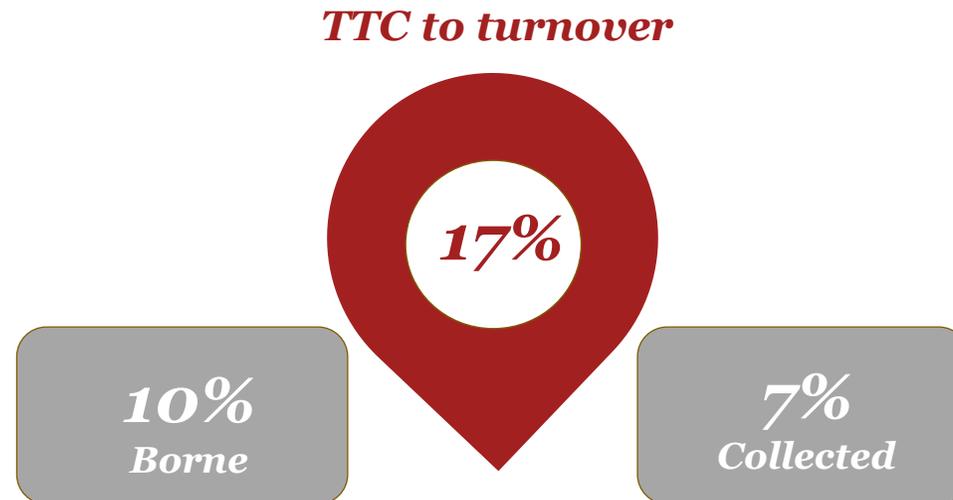
3. TTC of Enel Peru in 2018

TTC Indicators

TTC with respect to turnover

TTC with respect to turnover is an indicator that reflects the extent of the contribution made by the Company in relation to the size of its business.

For Enel, the average Total Tax Contribution rate in relation to net revenues averages at **17%** for 2018. In other words, for every **Soles 100** of the Company's turnover, **Soles 17 are used to pay taxes**, of which **Soles 10** are taxes borne and **Soles 7** are taxes collected.



Source: PwC

“Enel pays Soles 17 in taxes for every Soles 100 of net revenues, of which Soles 10 represent a direct cost for the company.”

3. TTC of Enel Peru in 2018

TTC Indicators

Tax value distributed to society

According to the TTC methodology, the distributed value of a company is made up of the sum of the following elements:

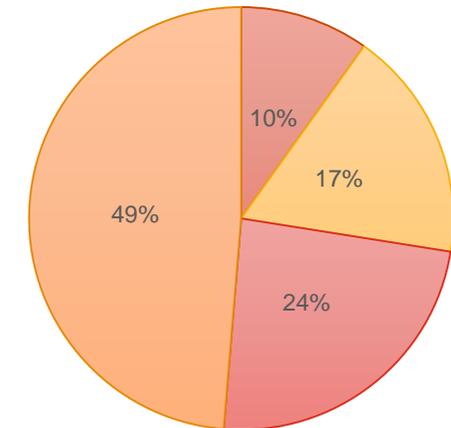
- Net interest
- Wages and salaries (net of taxes collected on payments to employees)
- Taxes (borne and collected)
- Shareholder value (i.e. dividends, reserves etc.)

The **distributed tax value ratio** indicates the percentage of the total value generated by Enel that is used to pay taxes borne and collected to Public Administrations. The distributed tax value is, in essence, a reflection of how Enel contributes to society the economic value it generates.

Item	Amount (PEN)	%
Wages and salaries	195,443,000	10%
taxes collected	351,072,567	17%
taxes borne	472,388,589	24%
income after taxes	966,156,134	49%
TOTAL	1,985,060,290	100%

Source: PwC

Chart 7: Tax Value Distributed by Enel in 2018



Source: PwC

■ Wages ■ taxes collected ■ taxes borne ■ income after taxes

In 2018, the total distributed value amounted to **Soles 1,985 million**, of which **823 million** were paid to different public administrations in the form of taxes borne and collected.

As can be seen from the chart, **41%** of the value generated by Enel benefits society through the payment of taxes borne and collected in Peru.

“In 2018, 41% of the value generated by Enel Peru was used to pay taxes borne and collected.”

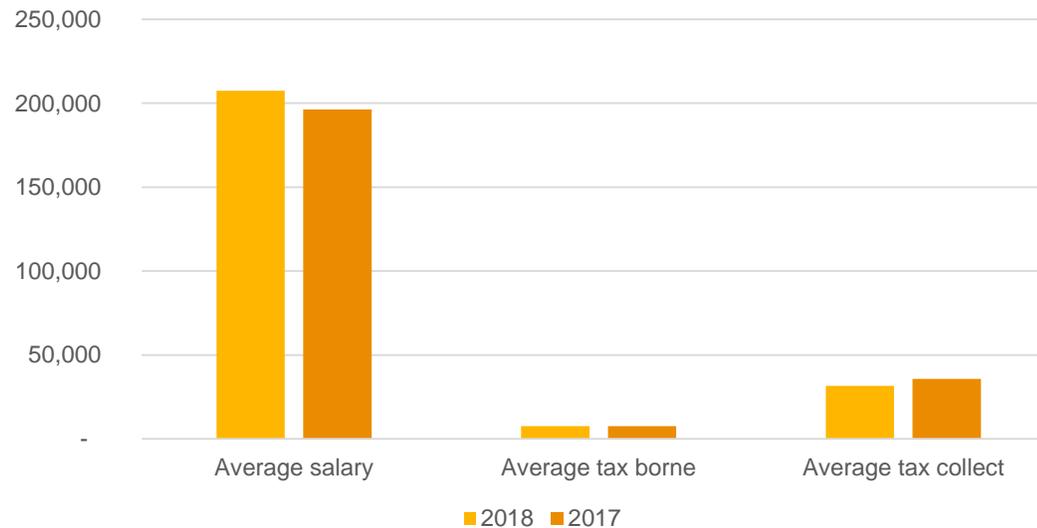
3. TTC of Enel Peru in 2018

TTC Indicators

Taxes paid in respect of wages and salaries per employee

Taxes paid in respect of **wages and salaries per employee** are an indicator that relates the level of employment to associated taxes. This indicator is calculated by dividing total taxes linked to employment (borne and collected) by the number of employees.

Chart 8: Trend in average salary and average taxes linked to employment in Enel



In 2018, Enel paid in employment taxes totalling **Soles 39,178** per employee. Of this figure for employment taxes, **Soles 32 million** correspond to taxes collected on payments to employees and **Soles 8 million** to taxes borne by Enel.

Source: PwC

“Employment taxes borne and collected have remained constant over the period, in line with the figures for wages and salaries and the number of employees.”



4. Comparative Indicators

4. Comparative Indicators

Corporate Income Tax Effective Rate

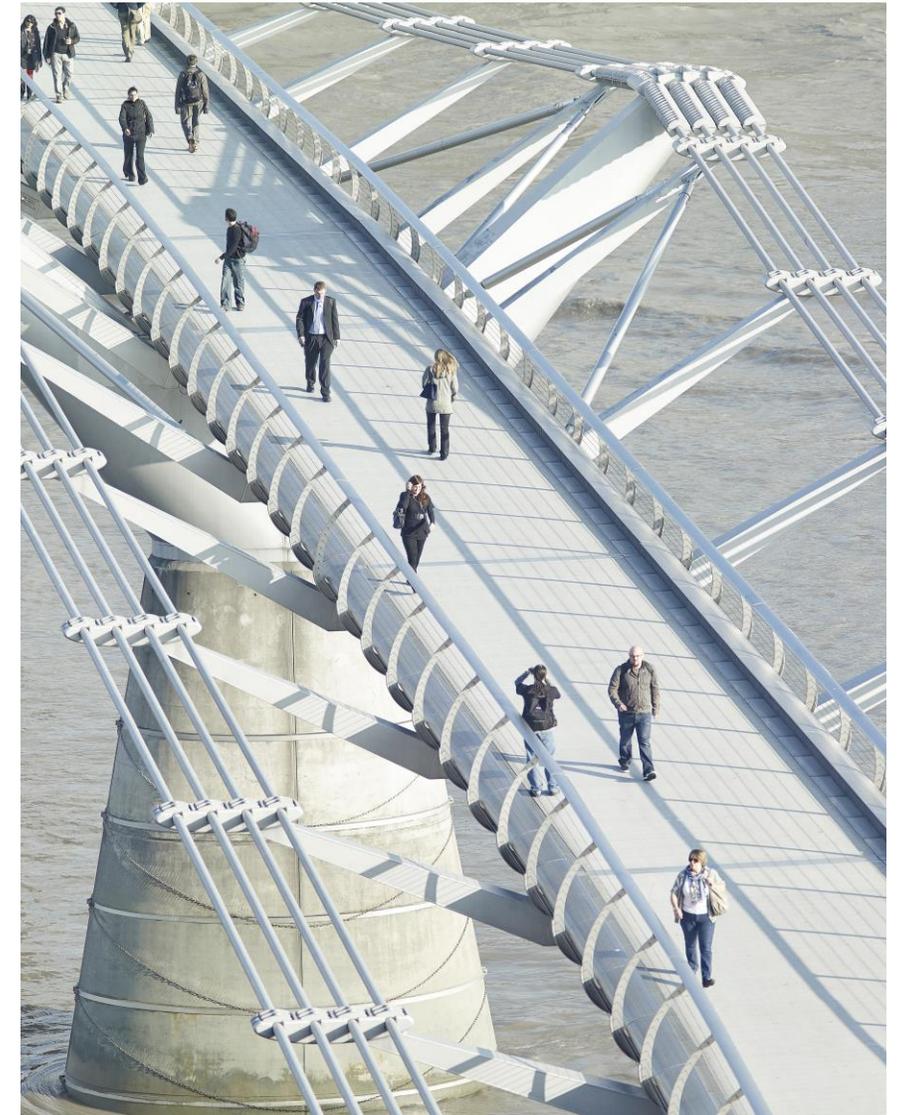
The benchmarks considered below for the purposes of comparison is the Corporate Income Tax effective rate of the companies competing in the energy distribution and generation industry in Peru with Enel; in the years 2017 and 2018.

Our methodology is based on the information publicly available; tax expense data is information which is published by companies in their individual annual accounts and this enables us to perform comparative analyses such as that contained in this section. Comparison between Enel Country's ETR and peers' ETR was performed.⁴

These rates are resulting from the following calculations for 2017 and 2018:

Year	Profit Before Tax (MS/)	Corporate Income Tax	ETR (%)
2017	1,186,138	388,914	32.8%
2018	1,406,703	440,547	31.3%
2017+2018	2,592,841	829,461	32.0%

⁴ Methodology described in appendix V.



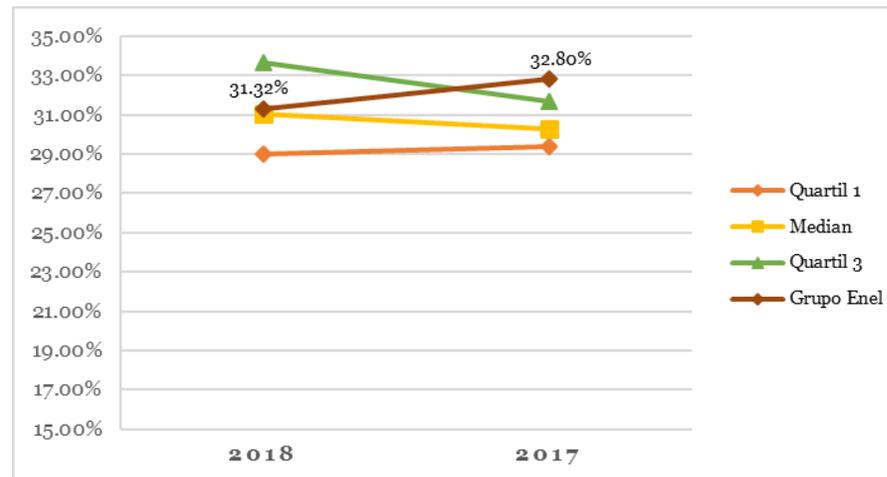
4. Comparative Indicators

Comparison of the ETR of Enel Group with that of the energy companies (1/2)

The effective tax rate (ETR), calculates as the ratio of **Corporate Income Tax expense to income before taxes**, the attached chart compares the effective tax rate of Enel Group with the average effective tax rate of ten companies in the energy generation and distribution industry (energy companies), calculated from their information available in the SMV⁵, Peru's organism that regulates the information for public companies.

⁵ Superintendencia de Mercado de Valores.

Chart 9: Comparison of the ETR of Enel Group with that of the SMV companies



The above chart shows that the average effective tax rate of the energy companies for 2018 is 31.23%, which is approximately 0.09% lower than the ETR of Enel Group for the period, which amounts to 31.32%.

In any event, Enel Group's average ETR for the period 2017-2018 amounts to 32.06%. This is in line with the average rate of the SMV companies for the period, which is 30.84%.

“The average Effective Tax Rate of Enel for the period 2017-2018 was 32.06%, in line with the average ETR of the SMV companies for the same period.”

4. Comparative Indicators

Reconciliation between the nominal rate and the effective tax rate of Enel Group (2/2)

In relation to the difference between the nominal rate in 2018 (29.5%) and the effective tax rate (31.32%), indicated below are the factors affecting the ETR of Enel Group.

The following chart shows the factors that are favourable to an increase of the nominal rate (those with a positive impact are situated above 0%).

These factors are grouped into three general categories, based on the descriptions provided by Enel Group in the reconciliation between book result and tax expense contained in the consolidated annual accounts.

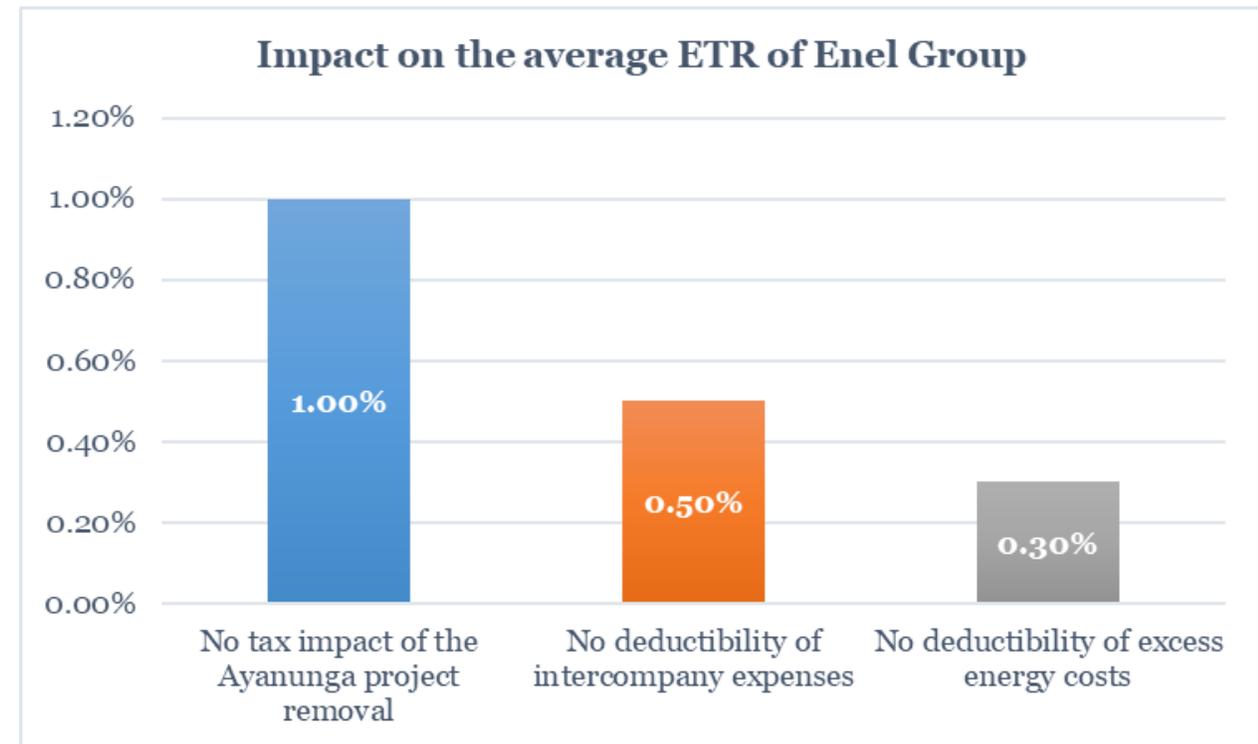
As we can see, the three factors that impact on Enel Group's nominal tax rate are non deductible expenses.

In the first place, these factors are related with the removal of the Ayanunga project, whose cost did not have a tax impact on the Enel Group's results, representing 1.00% of the difference between the nominal tax rate and the ETR.

In addition, certain intercompany expenses were not deductible. This factor represented 0.50% of the difference between the nominal tax rate and the ETR.

Finally, a 0.3% difference is due to a non-deductibility commercial loss. The public regulation organism establishes a reasonable limit of commercial loss due to robbery, than can be deductible from the corporate income tax. The 0.3% represents the excess of commercial loss that is not deductible.

Chart 10: Factors affecting the nominal tax rate



Source: PwC

A man in a dark suit and glasses stands in a modern, brightly lit transit station. He is looking down at a device in his hands. A black briefcase sits on the floor next to him. The station features a complex, geometric ceiling structure with a grid of beams and a polished floor that reflects the overhead lights. A metal railing runs along the edge of the platform. A green exit sign is visible in the background. A large red semi-transparent overlay covers the left side of the image, containing the text '5. Appendices' in a white, italicized serif font.

5. Appendices

5. Appendices

Appendix I: 2018 and 2017 summaries for Enel Peru

Total payments made to public authorities Summary Enel Peru 2018		
	Amount (MS/)	Percentage (%)
Taxes borne	472	57%
Taxes collected	351	43%
Total Tax Contribution	823	100%

Total payments made to public authorities Summary Enel Peru 2017		
	Amount (MS/)	Percentage (%)
Taxes borne	502	63%
Taxes collected	294	37%
Total Tax Contribution	796	100%

5. Appendices

Appendix II: TTC Report of Enel Peru in 2017

TTC of Enel Group in 2017 2017 Country Report																																																																																																																										
Country	Peru	31/12/2017																																																																																																																								
Economic data Amount (local currency)																																																																																																																										
Revenues		5,423,637,000																																																																																																																								
Wages and salaries		184,959,000																																																																																																																								
Average number of employees		949																																																																																																																								
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Other public domain charges		Other environmental taxes (regional)	5,830,957																																																																																																																							
Environmental Taxes	5,830,957	Tax on nuclear services																																																																																																																								
Taxes on electricity		Other taxes																																																																																																																								
Tax on hydrocarbons		TOTAL	502,066,289																																																																																																																							
Tax on value of electricity generation		TOTAL	293,978,584																																																																																																																							
Tax on nuclear fuels																																																																																																																										
Hydraulic charge tax																																																																																																																										
Tax on coal																																																																																																																										
Other environmental taxes (regional)	5,830,957																																																																																																																									
Tax on nuclear services																																																																																																																										
Other taxes																																																																																																																										
Total Tax Contribution in Peru		796,044,873																																																																																																																								
Other regulatory payments																																																																																																																										
Payment to energy fund																																																																																																																										
Other																																																																																																																										
Total payments to Public Authorities		796,044,873																																																																																																																								

- ¹ Total taxes borne / Income before taxes borne
² Total Tax Contribution / Revenue
^{2*} Taxes borne / Revenue
^{2*} Taxes collected / Revenue
³ Tax borne and collected / Total value distributed (regarded as the sum of: income after tax or shareholder value, wages and salaries, net interest, taxes borne and taxes collected)
⁴ Wages and salaries / Number of employees
⁵ Total taxes linked to employment (borne and collected) / Average number of employees

5. Appendices

Appendix III: List of taxes

LIST OF TAXES						
TTC 31/12/2017						
COMPANY: GRUPO ENEL PERÚ		Debe completar solo una celda para cada grupo (grupo rosa, naranja y verde) con una "P" mayúscula				
IMPUESTOS	IMPUESTO ESTATAL	IMPUESTO REGIONAL	IMPUESTO LOCAL	IMPUESTO ASUMIDO	IMPUESTO RECAUDADO	ALCANCE
IMPUESTO A LAS GANANCIAS						
Pago a Cta Rta 3era categoría	✓			✓		✓
Impuesto a la Renta 3era Categoría	✓			✓		✓
Retención Impuesto a la Renta sobre los Dividendos	✓				✓	✓
Retención Impuesto a la Renta No Domiciliados	✓				✓	✓
I. R. 4TA. CATEGORIA	✓				✓	✓
IMPUESTOS A LA PROPIEDAD						
Impuesto predial			✓	✓		✓
Arbitrios municipales			✓	✓		✓
Impuesto Temporal a los Activos (ITAN)	✓			✓		✓
IMPUESTOS DE EMPLEO						
I. R. 5TA CATEGORIA	✓				✓	✓
Essalud	✓			✓		✓
Senati	✓			✓		✓
IMPUESTOS SOBRE PRODUCTOS Y SERVICIOS						
Impuesto General a las Ventas (IGV)	✓			✓	✓	✓
AD Valorem	✓			✓		✓
Retención IGV	✓				✓	✓
Impuesto a las Transacciones Financieras (ITF)	✓			✓		✓
Organismo Supervisor de la Inversión en Energía y Minería (OSINEP/OSINERGMIN)	✓			✓		✓
Organismo de Evaluación y Fiscalización Ambiental (OEFA)	✓			✓		✓
Ministerio de Energía y Minas (MEM)	✓			✓		✓
IMPUESTOS AMBIENTALES						
DERECHO DE AGUA	✓			✓		✓
OTROS PAGOS DE IMPUESTOS A LA ADMINISTRACION PUBLICA						
FISE	✓				✓	✓

5. Appendices

Appendix IV: List of the 10 energy distribution and generation companies

Name	Country
Empresa De Generación Eléctrica Del Sur S.A. (Egesur)	Peru
Empresa De Generación Electrica San Gaban S.A.	Peru
Empresa Electricidad Del Peru S.A. - Electroperu S.A.	Peru
Enersur S.A.	Peru
Kallpa Generación S.A.	Peru
Shougang Generación Electrica S.A.A	Peru
Electro Sur Este S.A.A.	Peru
Electro Dunas S.A.A.	Peru
Luz del Sur S.A.A.	Peru
Electropuno	Peru

Appendix V: Methodology used in the comparative analysis of effective Corporate Income Tax rates

The analysis has been based on the publicly available information of competitors of Enel Peru.

The effective rate of taxation for Corporate Income Tax purposes (ETR), has been calculated as the ratio of Corporate Income Tax expense to Income before Taxes, with both of these figures being obtained from the consolidated income statement for the year.

The average figure for the last two years for which data is available (2017 and 2018) has been used to illustrate the findings:

- ***Adjusted arithmetical average***

Our findings in relation to the individual analyses of the companies are based on a statistical analysis of ETRs. In this type of analysis, there are generally elements that distort the average, such as non-recurring transactions or exceptional items, and these must be eliminated to draw reasonable conclusions from the sample studied.

- ***Quartiles***

The upper (75%) and lower (25%) quartiles are also calculated for the sample of companies, indicating the results obtained. This facilitates identification of the range of average results within which the majority of the companies are situated.



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