



Policy on Communication of Information, Contacts and Involvement with Shareholders, Institutional Investors, Asset Managers, Proxy Advisors and other stakeholders of Enagás, S.A.

1. INTRODUCTION AND PURPOSE

The Board of Directors of Enagás, S.A. (“**Enagás**” or the “**Company**”) is legally entrusted with the **non-delegable power** of determining the general policies and strategies of the Company and of the Group of which it is the parent company (the “**Group**”).

In turn, the Recommendations of the Code of Good Governance of listed companies (the “**Code of Good Governance**”) approved by the National Securities Market Commission (the “**CNMV**”) indicate the need for listed companies to define and promote a policy of communication and contacts with shareholders and institutional investors within the framework of their involvement in the company, and with proxy advisors, and that they also have a general policy regarding the communication of economic-financial, non-financial and corporate information, with the Board of Directors’ Regulations of the Company having incorporated the power of the Board of Directors to approve such policy.

On 22 February 2023, the CNMV approved the Code of Best Practices for Institutional Investors, Asset Managers and Proxy Advisors in relation to their duties in respect of assets vested or services provided (the “**Code of Best Practices for Investors**” or the “**Code**”), and in March 2023 the Public Communication Policy (the “**Communication Policy**”), which has an impact on certain aspects of this Policy.

In this regard, the purpose of this Policy is to **foster the permanent dialogue and discourse between the Company and** its shareholders and institutional investors, as well as with asset managers and proxy advisors (the “**stakeholders**”) and to develop the dissemination and quality of the information available to the market, investors and other stakeholders, all within a framework of full **transparency and accessibility**.

2. GENERAL PRINCIPLES

In accordance with applicable legislation, the Enagás Corporate Governance System, the Company’s corporate values as defined in the Code of Ethics and the best practices of good governance, this Policy defines **the strategy for communicating the Company’s economic-**

financial, non-financial and corporate information and contacts and involvement with its stakeholders, based on the following **principles of action**:

- **Transparency, clarity, truthfulness and accuracy of information.**

Enagás shall ensure at all times that all information, regardless of the subject to which it refers or the regulatory basis on which it is based, and which is disseminated to its stakeholders and to the markets in general and other stakeholders, is governed by the principles of transparency, clarity, truthfulness and accuracy of information, using, in all cases, language that is comprehensible to investors, the market in general and stakeholders.

In this regard, the priority of Enagás shall be the introduction of measures targeted at reinforcing informative transparency, for the purpose of providing shareholders, investors and the public at large with relevant information on the Company's progress.

In this regard, informative transparency represents one of the essential corporate values of Enagás, and is a key element in the **communication strategy**.

Specifically, the Board of Directors shall adopt and execute any acts or measures as required to guarantee **the Company's transparency with the financial markets**, to promote the proper formation of the Company's share prices complying with the legal obligations imposed through Enagás' listed-company status.

- **Continuity, accessibility and immediacy.**

The Board of Directors shall ensure, on an ongoing basis, the promotion of the dissemination of information, facilitating access to the different information channels and mechanisms that are articulated in the implementation of this Policy.

- **Building trust in the Company.**

Enagás shall promote the quality of the information made available to its stakeholders and other groups of interest, seeking at all times to protect its shareholders and the markets in general, respecting, in all cases, the applicable regulations on privileged information and other relevant information.

- **Promotion of shareholder involvement in the Company.**

Enagás shall promote the active, informed and responsible participation of shareholders in corporate life, with the Company's General Meeting of Shareholders being the main channel in this regard, facilitating the exercise of their rights at the meeting.

- **Dialogue, availability and collaboration.**

The Company will promote dialogue with its stakeholders through the various communication channels established for this purpose, ensuring maximum availability and collaboration on the part of the Company's managers.

- **Equal treatment and non-discrimination.**

Enagás shall promote and guarantee equal treatment for all shareholders that are in the same position and who are not affected by conflicts of interest or jurisdiction, respecting their legitimate rights and interests.

- **Informational symmetry**

In its communication and engagement with its stakeholders, Enagás shall ensure that there is no asymmetrical distribution of information with respect to the various stakeholders and, in particular, with respect to its shareholders and, therefore, that significant shareholders do not have undue access to confidential information of the Company.

- **Innovation, improvement and development in the use of new technologies.**

Aware that new information technologies have a significant impact and influence on social activity and its relations with its stakeholders, Enagás shall endeavour to use the most appropriate technologies and tools to improve the dissemination of information and provide an appropriate response to the demands of its stakeholders.

- **Compliance with current legislation and the Enagás Corporate Governance System, and assumption and implementation of the recommendations, principles and best practices of good governance assumed by the Company and collaboration with supervisory bodies**, in relation to the Company's communication strategy.

3. GENERAL CHANNELS OF COMMUNICATION AND INFORMATION

3.1. WEBSITE OF THE NATIONAL SECURITIES MARKET COMMISSION

The CNMV is responsible, through its corporate website (www.cnmv.es), for disseminating Enagás' regulated information to the market, as well as the publication of prospectuses and information on its main transactions, included in its registers, and the Company is responsible for submitting to the CNMV all information required by the deadlines and terms established in the regulations in force.

3.2. CORPORATE WEBSITE OF ENAGÁS

The Company's corporate website (www.enagas.es) will be the main channel for regulated and relevant communication, as well as for Enagás' economic-financial, non-financial and corporate information with its stakeholders, other interested parties and the markets in general.

Among others, the following **information and content** will be published:

- **Enagás corporate information:** on Enagás' activity and strategy, on the people and talent that form part of Enagás, on sustainability, its strategy and sustainable management, on the Enagás Ethics Channel, on Enagás' Suppliers, including, among others, the procedure for their approval.
- **Contents related to the Technical Management of the Gas System:** its protocols and procedures, operation, planning and system capacities.
- **Content related to the Energy Transition:** with information on the gas network, renewable gases, aspects of innovation and digitalisation, among others.
- **Information on corporate governance in the Enagás Shareholder and Investor area:** where stock market information, general information, economic-financial information and aspects of corporate governance, among others, will be made available to shareholders and investors.
- **Corporate communication:** specific section in which company news, press releases, publications, among others, will be disseminated.

- **Contact details:** this section shall provide the main contact details of Enagás for shareholders and investors to enable them to make enquiries or suggestions to the Company.

The corporate website shall be used to disseminate any other content that the Enagás Board of Directors considers to be of interest to its stakeholders and the market in general. In all cases, the Board of Directors shall be responsible for **establishing the content** of the information to be provided on the Company's corporate website, keeping the information on the website **up to date**, ensuring that it is an **effective information tool** and coordinating its content with the documents deposited and registered in the corresponding public registers.

3.3. ENAGÁS ENERGYDATA APP

Enagás will make available on its corporate website information on the "Enagás EnergyData App", through which users who download it to their mobile phones will be able to access real-time data on the Gas System and the latest news and information on events organised by the Company for professionals in the gas sector.

3.4. SOCIAL MEDIA

Taking into account the advantages of new communication channels, such as social media, for greater dissemination of information to stakeholders and the market in general, Enagás' communication strategy will include a presence on social media, with corporate accounts and profiles on Facebook, YouTube, Twitter/X and LinkedIn, as well as other networks it deems appropriate, in order to reach the maximum number of recipients regardless of their profiles. These accounts and profiles will include press releases, news, presentation of earnings, information on Enagás' current affairs and any other information that may be of interest to users of these communication channels.

On the other hand, and without prejudice to the provisions of securities market regulations on the disclosure of inside information, the Company may use social media to communicate inside information simultaneously, as an additional or complementary channel to the CNMV, provided that the information is communicated in a formal and precise manner and is produced through a social network of very wide distribution and from accounts with a very large following, at all times the recommendations of the CNMV in this regard.

3.5. MEDIA

In order to maximise the dissemination and quality of the information available to stakeholders, other interested parties and the market in general, Enagás will inform the **media** directly and on a timely basis on the occasion of the presentation of its annual results, on the Company's progress, its projects and any issues that may be of interest, always taking into account the applicable regulations on the processing of inside information and other relevant information.

To encourage and facilitate contact between the Company and the media, Enagás shall provide the possibility of contacting the **Department of Communication, Institutional Relations and Investors** by email, telephone or social media, for the purpose of making requests and/or enquiries.

4. SPECIFIC CHANNELS OF COMMUNICATION AND INFORMATION TO STAKEHOLDERS

In addition to the aforementioned general channels of communication and information, for the purpose of **encouraging accessibility and transparency**, ongoing dialogue and the **frequent exchange of information with stakeholders**, Enagás shall introduce specific

channels of communication and dissemination of information with its different **stakeholders**, always respecting the principles set out in this policy.

4.1. CHANNELS OF COMMUNICATION AND INFORMATION WITH SHAREHOLDERS

4.1.1. Shareholder's Office

The Company shall provide shareholders with the "*Shareholder's Office*". This is an immediate and direct communications service accessible to all Enagás shareholders and through which they shall be able to consult any information concerning the Company, **by post or telephone and/or email** to the Department of Investor Relations, in order to resolve or get a response to their enquiries, doubts and questions, as well as for making suggestions. The contact details of the "*Shareholder's Office*" will be published on the corporate website.

4.1.2. Specific section on the Company's corporate website

In the "*Shareholders and investors*" section of the corporate website, Enagás shall disseminate the legally obligatory content and information, as well as those that may be of interest to shareholders.

In particular, this section shall contain the following information:

- **Stock Market Information:** allowing shareholders who so wish to access information regarding **stock market data** on the share, the dividend, Takeover Bids, Initial Public Offerings (IPOs), significant shareholdings and treasury stock, among others.
- **Economic-Financial Information:** with access to the periodic public information submitted to the Spanish regulatory bodies, such as the Annual Accounts, Directors' Reports and Audit Reports and, in general, the public information submitted to other regulatory bodies, among other aspects.
- **Information on Corporative Governance:** all that information concerning corporate governance **aspects** such as its corporate texts and other internal rules of the Company, information on the notice to call the General Meetings of Shareholders, as well as all documentation related to these; information concerning the Board of Directors and its Committees, the Annual Corporate Governance Report, the Annual Report on Remuneration of Directors and the Shareholders' Online Forum, among others.
- **Socially Responsible Investor:** with information on sustainability and the promotion of ESG actions (environmental, social and governance).
- **Disclosures to the CNMV:** which includes communications of inside information and other relevant information.

In any event, Enagás shall endeavour to use language that is comprehensible to shareholders and the markets in general, avoiding, as far as possible, technical terms and foreign words (or defining them), without prejudice to the dissemination of public communications in English when Enagás deems it appropriate.

4.1.3. The General Meeting of Shareholders

The General Meeting of Shareholders represents the main channel for shareholders to take part in the governance of the Company.

For these purposes, the Enagás Board of Directors shall make it a **priority to promote the informed and responsible participation of shareholders at the General Meeting of**

Shareholders, as well as to facilitate the **exercise** of their **rights**, all in line with the principles of the Code of Good Governance, applicable legislation, the Enagás Corporate Governance System and, in particular:

- It shall make available to the shareholders, prior to the General Meeting, all **legally required information** in the form and within the time limits established by law and such additional information as the Board of Directors considers relevant and can be reasonably provided. Likewise, it shall respond, with the utmost diligence, to **requests for information** made by **shareholders** prior to the General Meeting, as well as any **clarifications** they may request during the meeting.
- It will have the permanent support of the *Shareholder's Office*, and may use the services of agencies, entities and financial intermediaries for a better distribution of information to its shareholders.
- It will broadcast the General Meetings live on the corporate website.
- It shall collaborate with the intermediary entities, under the terms provided for by law, in order to ensure that the ultimate beneficiaries are provided with all the information intended to facilitate the exercise of their rights inherent to the shares held by such entities.
- It shall ensure compliance with the provisions of the Enagás Corporate Governance System and, in particular, with hydrocarbon sector regulations in relation to limitations on the exercise of voting rights, by virtue of which no individual or legal entity may hold more than 5% of Enagás' share capital, nor exercise voting rights in the Company in excess of 3%. Furthermore, in the event of those subjects that perform activities in the gas sector, no natural or artificial person may exercise voting rights for more than 1% of the share capital.

Furthermore, under the terms set out in current regulations, the Company's corporate website shall include a **Shareholders' Online Forum**, to which both individual shareholders as well as any voluntary associations that may be set up shall be able to access with the appropriate guarantees, to provide them with information prior to the General Meetings.

4.2. COMMUNICATION AND INFORMATION CHANNELS WITH INSTITUTIONAL INVESTORS, ASSET MANAGERS AND PROXY ADVISORS

Enagás recognises the legitimate expectation of institutional investors and asset managers to have information and be able to assess their investments and, therefore, the desirability of being aware of all those aspects that may affect the **long-term value creation of their investment in Enagás** (among others, its strategy, objectives and business plans, its capital structure, its financial and non-financial information, risk factors and opportunities for sustainability, the quality of its corporate governance and the degree of compliance with good governance recommendations assumed by the Company), all of which is also applicable in the case of proxy advisors with respect to the preparation of their **voting recommendations** at General Meetings.

In this regard, Enagás shall make every effort to ensure that public financial, non-financial and corporate information (in particular, the content of the mandatory annual reports and the corporate website) is as complete, clear and accurate as possible, expanding this mandatory information, whenever proportionate, with such other information as it may provide to the markets, in accordance, in all cases, with the law, its confidentiality obligations and the principles of equal treatment of shareholders and symmetry of information to the markets,

encouraging the **regular two-way exchange of information between the company and its shareholders and institutional investors**.

Notwithstanding the foregoing, and taking into account the dedication and costs that this may entail for the Company, Enagás assumes that institutional investors, asset managers and proxy advisors, in their relations and contacts (engagement actions) with Enagás, shall act in accordance with the **principles of proportionality, responsibility and good faith**, taking into consideration the necessary balance between, on the one hand, the legitimate expectation of obtaining information to acquire adequate knowledge of the Company and, where appropriate, being able to make suggestions for its valuation by the Company in order to maximise the long-term value of its investments and, on the other, not affecting the normal operation of the Company and its business, particularly the day-to-day management of the Company by the Enagás management team and the strategic and supervisory functions of the Board of Directors at Group level.

4.2.1. Channels of communication and information with institutional investors and asset managers

a) Investor Relations Area

The Board of Directors of the Company shall establish systems to enable the **regular exchange of information with its institutional shareholders** on matters such as investment strategy, performance evaluation, the composition of the Board of Directors itself and management efficiency.

To this end, Enagás shall introduce an Investor Relations Area to permanently deal with enquiries and suggestions from institutional investors (professionals or qualified persons), asset managers, rating agencies, bondholders, by providing a telephone number and email address for this purpose.

b) Investor's Agenda

Enagás will provide information in a specific section on the corporate website (*"Investor's Agenda"*) about the Company's initiatives with its institutional investors and analysts (such as broadcasts of presentations of results for the current year and the dates of events in previous years as well as relevant future events) and will make documents and presentations of interest to them available.

c) Roadshows - Informative meetings

Enagás shall organise road shows with qualified and institutional investors and asset managers, analysts, ESG investors, minority shareholders, bondholders and rating agencies on the progress of the Company and the Group, as well as on other aspects of interest, all with the aim of fostering dialogue and regular exchange of information.

d) WhatsApp

. This one-way communication channel with minority shareholders publishes the most relevant news or news that may be of interest to this stakeholder group, as well as news or important dates in the investor calendar.

e) Shareholder newsletter

The Shareholders' Newsletter is a summary document of the results presentation, which provides access to the most relevant information of each quarter in a simple and conceptual way. It is available on the Enagás website both in Spanish and in English.

4.2.2. Communication with proxy advisors

The Company shall ensure that communication activities and contacts with proxy advisors are made sufficiently in advance of the General Meeting of Shareholders being called and held so that Enagás can provide them with the appropriate explanations and clarifications necessary to prepare their voting recommendations at the Meetings and, where appropriate, respond to their suggestions, evaluating them with the necessary care.

To this end, Enagás shall maintain regular contact with those proxy advisors with the greatest market presence in order to inform them of the specific characteristics of the Company and its environment, so that voting recommendations can be based on knowledge of the unique features of the Company and its activity.

The provisions of this Policy with respect to proxy advisors shall apply to the extent applicable to financial analysts, rating agencies (financial, ESG...) and other similar entities.

5. COMMUNICATION WITH OTHER ENAGÁS STAKEHOLDERS

Without prejudice to the information and communication channels available to the Company under the terms referred to in this Policy, Enagás shall establish processes of dialogue and collaboration with other stakeholders such as regulatory bodies, different administrations, employees, customers, suppliers, financial institutions, associations and foundations in order to identify their needs and expectations.

Internal communication with employees: Enagás provides its professionals with economic-financial information and information on important company events. The information transmitted through these channels is aligned with external communication. The internal communication channels for this purpose are:

Intranet: corporate information repository

Ráfagas: bimonthly newsletter sent by email to all professionals. It includes the news of the last two weeks with the news published on the intranet in that period.

Magazine: quarterly online publication that covers the current affairs of the company and its professionals through different reports, interviews (brief and in-depth) about their work or hobbies.

Email: high impact communication channel, limited to certain occasions where very high employee involvement or attention is required.

Digital signage at Headquarters

6. INTERNAL COORDINATION FOR THE DISSEMINATION OF INFORMATION LIKELY TO CONTAIN INSIDE INFORMATION OR OTHER MATERIAL INFORMATION

Without prejudice to the provisions of this Policy, Enagás shall establish the necessary internal procedures to ensure coordination between departments, in order to ensure that information containing inside information or other relevant information is reported to the CNMV through the channels and within the deadlines established, in accordance with the Law and the Corporate Governance System.

7. SUPERVISION, AMENDMENT AND DISSEMINATION OF THE POLICY



Within the framework of its duty to supervise the communication strategy and relations with shareholders and investors, the **Sustainability and Appointments Committee** shall be the body in charge of regular supervision of the application, content and implementation of this Policy, reporting all this to the Board of Directors.

Likewise, the Sustainability and Appointments Committee shall propose to the Board of Directors such amendments to this Policy as it deems appropriate or necessary.

This Policy shall be published on the Company's corporate website, including information concerning the way in which the policy has been put into practice and duly identifying those responsible for implementing it.

This Policy was approved by the Enagás Board of Directors on 18 December 2023, superseding the previous version approved on 21 December 2020 (replacing the Policy of 21 December 2015).