

**Prevention and action
protocol for any workplace
harassment situation**



1. Statement of principles and purpose of the protocol

To establish guidelines that will enable us to recognise a situation of harassment in the workplace, whether psychological, moral, sexual, or gender-based, in order to resolve a discriminatory situation while always ensuring that the victims rights are upheld.

This protocol is related to section 2. III. of the Enagás Code of Ethics "Security: We care about people and safety". It develops behavioural guidelines related to respect for people and the protection of health and safety in relation to the handling of possible cases of harassment in the workplace and in this document, it regulates the procedure to be followed in the event of harassment.

Enagás expressly rejects abuse of authority, harassment, and any other behaviour that could create an intimidating, offensive, or hostile work environment.

2. Scope of application

Aimed at all directors, managers and professionals, regardless of the type of contract that governs their employment relationship, the position they hold or the place where they work, and of any company over which Enagás has management control. Exceptionally, this also applies to interns, without altering in any way the training and non-employment nature of their relationship with the Company.

3. Validity

This Protocol shall enter into force on the date of publication of the 2nd Equality Plan of the Enagás Group. It shall remain in force until amended or replaced by another. The Protocol in force at any given time is available to all employees on the company intranet.

4. Reference documentation

- Enagás Code of Ethics.
- Enagás Group Diversity and Inclusion Policy.
- Crime Prevention Policy.

5. Responsibilities

Participating units

Talent Management Area, People and Wellness Area, Ethical Compliance Committee, Audit and Compliance Committee, employee.

The Ethical Compliance Committee is responsible for the overall administration of this Protocol, ensuring its proper implementation, dissemination, monitoring and continuous improvement so that it is constantly adapted to actual operations.

One of the guiding principles for all those involved in the process set out in this protocol is respect for the dignity of the individual.

Enagás explicitly states that it will not tolerate retaliation against those who use the reporting procedures described herein. The Ethical Compliance Committee shall immediately contact any professional who believes that the use of this Protocol has caused them harm.

The Code of Ethics also guarantees the protection of the identity of informants and persons who may be involved in the process, as well as the confidentiality of the information received.

The various internal bodies that may be involved are subject to the same obligations of anonymity, confidentiality and non-retaliation that apply to the Ethics Compliance Committee and have access to the identities of whistleblowers only to the extent that this information is essential to the resolution of the relevant report.

An identification number will be used and the name of the person harassed will be omitted from all communications made internally and to employee representatives as a result of the action taken.

6. Definitions

Sexual harassment: Any behaviour, verbal or physically, of a sexual nature, that is unacceptable to the person subjected to it and which has the purpose of, or effect of, violating a person's dignity, especially when it creates an intimidating or degrading environment through inappropriate attitudes or statements or comments.

Gender-based harassment: Any conduct based on a person's sex or gender identity which has the purpose or effect of violating his or her dignity and creating an intimidating, degrading or offensive environment, as well as any adverse treatment or negative effect on a person due to his or her making a complaint, claim, report, demand or appeal with the aim of preventing discrimination and demanding effective compliance with the principle of equality between women and men.

Mobbing: Repetitive or persistent aggression by one or more people over a long period of time in the workplace or in relation to work. This may include verbal, psychological, or physical attacks. It is aimed at humiliating, belittling, insulting, coercing or discriminating against the victim, and it may force them to give up their jobs voluntarily.

The following behaviours, among others, may be deemed to be mobbing, whether on their own or together with others:

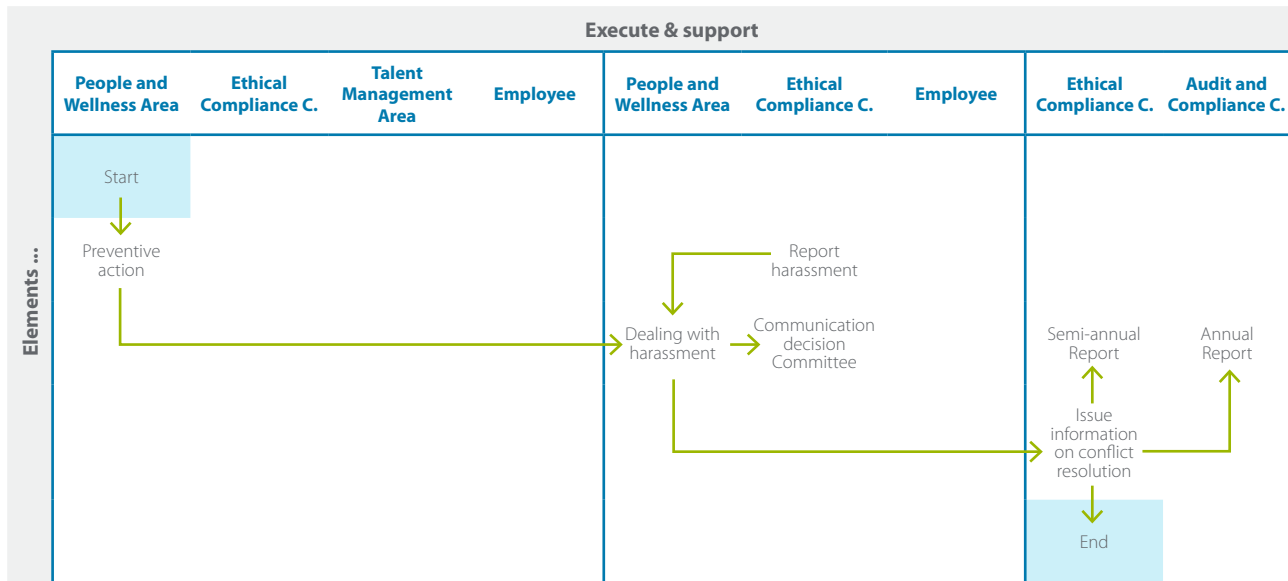
- Attacks on the dignity and respect of the individual, violating the principles set out in the Enagás Code of Ethics and in section 2 of this Protocol.
- Verbal violence.
- Isolation and rejection.
- Intentional deterioration of working conditions.

However, this should not be confused with any difficult situation that occurs within the company.

Hence, the following are examples of cases which are not considered to be mobbing:

- Excessive pressure at work to achieve goals or lack of rewards, which are conditioning factors for a stressful work environment; intentional humiliation must be excluded.
- Poor conflict resolution, as unpleasant situations can arise in any community and the way they are resolved is not always the right one.
- A less participative leadership style in the team, although this does not mean that it is intentional.

7. Flowchart



8. Development

Preventive action

Description

Management will promote measures to prevent and avoid harassment situations, such as:

- **Training:** This issue will be included in appropriate training programmes for all employees, especially those whose staff report to them.
- **Responsibility:** In accordance with the provisions of this Protocol and the Enagás Code of Ethics, all employees have an obligation and responsibility to establish and maintain relationships based on respect and dignity.

Furthermore, managers should have the following responsibilities:

- Ensure that the people who report to them are fully aware of and understand this Protocol.
- Ensure that harassment does not happen in their area, and monitor accordingly.

- **Communication:** All available means will be used to ensure all members of the company are informed about the Protocol.

Dealing with harassment

Description

In addition to the victim, any person who becomes aware of harassment can report the situation through the Enagás Whistleblowing Channel using the following communication channels:

- Electronic mailbox: canal.etico@enagas.es.
- Send a letter to Paseo de los Olmos 19, 28005 - Madrid, Spain (to the attention of the Chairman of the Ethical Compliance Committee).
- Forms provided on the Corporate Intranet.

The victim may also choose to report the harassment verbally to the Head of the People and Wellness Area in situations where it is expected that simply informing the aggressor of the intimidating and offensive consequences of his/her conduct will solve the problem quickly and efficiently. In the event that a solution accepted by both parties is not found within a period of 15 days, the victim will submit the complaint in writing to the above-mentioned offices and through the specified media.

Once received by the person chairing the Ethical Compliance Committee, that person will anonymously forward the communication to the other members of the same. In this way only one single person will know the identity of the sender of the communication. In the event the notification reaches a member the Ethical Compliance Committee, that person must inform the Committee chair, who will act as indicated at the beginning of this paragraph.

The person chairing the Ethical Compliance Committee may fully delegate to People and Wellness the conduct of the proceedings and the taking of any action deemed necessary to clarify the facts and prepare the report on the alleged harassment under investigation, which shall include the conclusions, possible mitigating or aggravating circumstances and a proposal for possible action to be taken.

Any of the parties can request the intervention of the workers' legal representative or the relevant prevention delegate at any time.

As a protection measure for the victim, and after the evidence of harassment has been established, the victim may be separated from the alleged harasser as a precautionary measure, or any other precautionary measures deemed necessary may be adopted.

At a meeting called for this purpose, the Ethical Compliance Committee shall decide on the appropriate measures to take to resolve the conflict. It will do so based on the report compiled from the results of an investigation of the facts leading to the complaint. It will then inform the victim in person of the measures adopted.

The maximum time limit for completion of the procedure is 45 days from the moment the complaint is filed.

If behaviour deemed to be harassing is found to be present, the company will apply the current disciplinary rules.

Issue information on conflict resolution

Description

Information regarding the processing of harassment notifications will be included in the half-yearly reports that the Ethical Compliance Committee submits to the Enagás Audit and Compliance Committee. This information shall include, but will not be limited to, the following:

- Indicators of the activity of the consultation and notification process.
- Notifications received and deemed admissible or inadmissible.
- Average response and processing times for requests and notifications received.
- Completed notifications.

Every year, Enagás will also publish certain data about the use of this established channel and the resolutions of conflicts through the Protocol in international reports. However, Enagás will not provide any information that could allow for the identification of those involved in this type of process.



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